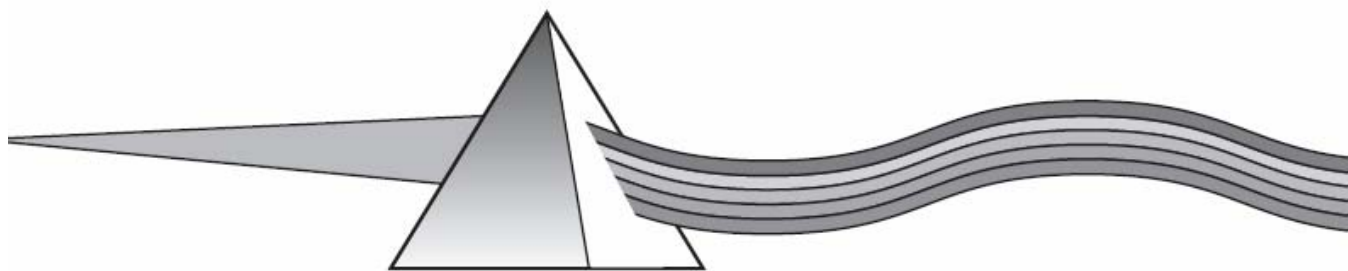


PRISM

*Program Review Instrument for Systems Monitoring
of Head Start and Early Head Start Grantees*



PRISM Guide 2006

The *PRISM Guide* was developed by The Lewin Group under Contract No. GS-23F-9840H. Every effort has been made to ensure the accuracy of the material in this guide; however, if any discrepancy exists between language in this guide and in any applicable statute, regulation, or policy issuance the language in the statute, regulation, or policy issuance is controlling.

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What's New in the Fiscal Year 2006

PRISM Guide

The Fiscal Year (FY) 2006 version of the *PRISM Guide (Guide)* replaces the FY 2005 *PRISM Guide*. The 2006 *Guide* continues to serve as a resource for grantees, Federal and non-Federal Team Leaders (formerly referred to as Lead Consultants), and reviewers. The information provided is intended to benefit all audiences; however, some sections of the *Guide* address individual audiences.

KEY CHANGES TO PRISM MONITORING SOFTWARE

A new software system, *PRISM 2006 Software*, is introduced for the FY 2006 monitoring season. The new software has enhanced capacity for collecting, aggregating, analyzing and reporting on monitoring data and tracking corrective action and follow-up activities. The redesigned software enables reviewers, Federal staff and technical assistance liaisons to electronically track information related to the PRISM review of a given grantee. The software includes two separate applications that support functioning in web-based and stand-alone environments (i.e., capable of functioning without access to the internet). The software:

- Standardizes review report writing by ensuring that areas of noncompliance identified in the review report are properly formatted, supported by sufficient evidence, and linked to the correct regulatory citations (stand-alone version);
- Facilitates the review process by providing electronic access to all PRISM instruments and tools, including the new service area protocols, core questions, the full set of standards, and checklists (stand-alone version);
- Facilitates collaboration and information sharing among review team members (both stand-alone and web versions);
- Allows for real-time access to information, which facilitates the tracking of corrective action activities and management of review activities (web version);
- Provides access to the most up-to-date standards and PRISM instruments (including protocols, checklists, and core questions), increasing the data's accuracy (web version); and
- Contains a centralized repository of aggregated PRISM review data to address Congressional and other requests for information (web version).

The software allows for integrated and seamless transitions between the stand-alone and web-based software interfaces. Automation of review preparation, on-site review activities, review report generation and transmittal to grantee, and corrective action tracking is intended to increase the consistency, accuracy and completeness of the monitoring data.

PROCEDURAL AND POLICY CHANGES

The purpose of the monitoring process is to identify and accurately describe for the grantee those areas for which its program is out of compliance with Federal regulations and other program requirements. Accordingly, if a grantee meets some but not all components of a given requirement, the narrative for the citation should only address those components for which the grantee is out of compliance. The purpose of the documentation is to report on the problem areas identified (i.e., “exceptions” to compliance). Accordingly, the review team will focus on compliance with Head Start standards and other requirements, and will no longer identify or report on grantee program strengths.

As part of the Head Start Bureau's (Bureau) efforts to focus on grantee compliance with Head Start performance standards and program requirements, monitoring will focus primarily on finding and reporting all exceptions to grantee compliance and will ensure that:

- noncompliances, including those designated as deficiencies, are clearly and accurately reported to grantees so that grantees can make corrections as quickly as possible and continue to provide services to children and families as required under the Head Start Act and other authorities;
- grantees correct deficiencies and other areas of noncompliance in the shortest amount of time reasonably necessary to fully correct the problem;
- all fiscal deficiencies and areas of noncompliance are promptly followed up on and misused Head Start grant funds are recovered, where appropriate.

The Head Start Review Report and Cover Letter have been combined into a single document that provides grantees with official notice of review findings. The redesigned Head Start Review Report provides general program information (e.g., review dates, funded and actual enrollment); determinations, including the specific citations, narrative, and any history related to the identified issue; and the timeframe for correction for each determination. Additionally, the *Guide* separates the review report and program improvement/corrective action activities into distinct phases, represented as two separate sections in the *Guide: Grantee Notice: The Head Start Review Report*, and *Program Improvement and Corrective Action*.

KEY CHANGES TO REVIEW ACTIVITIES AND THE PRISM INSTRUMENT

New Protocols

The FY 2006 *Guide* introduces protocols for Health, Nutrition and Disabilities areas, with protocols for Mental Health and Early Childhood Development anticipated in the first quarter of FY 2006. The protocols are designed to provide an overarching framework as well as detailed guidance to help reviewers address the primary standards related to the relevant service areas.

Fiscal Checklist

The Head Start Bureau continues its emphasis on improved fiscal monitoring and accountability. The FY 2006 Fiscal Checklist (revised from FY 2005) maintains a risk-based approach, but reorganizes the questions contained in the checklist into categories to guide the fiscal reviewer through the data collection and analysis process. The checklist is organized into five focal areas: (1) Fiscal Risk Indicators (2) Internal Controls and Monitoring; (3) Fiscal Accountability; (4)

Reporting; and (5) Summary Standards.

Core Questions

The following modifications have been made to the set of Core Questions:

- A new Mental Health Core Question (Core Question #11 in FY 2006) has been added to emphasize review of mental health program requirements.
- The Child Outcomes Core Question (Core Question #18 in FY 2005) has been eliminated.
- The FY 2005 Core Questions #11 through #17 (i.e., the Disabilities Core Question through the Facilities, Materials, Equipment and Transportation Core Question) have been renumbered to Core Questions #12 through #18.

Additional Modifications

The activities comprising the PRISM monitoring process have been modified as follows:

- The on-site review will focus on the collection, reporting, and analysis of data. The grantee presentation and summary meeting will no longer take place.
- For triennial and first-year reviews, Federal Team Leaders will not supervise reviews in their home region. Federal Team Leaders will, however, continue to supervise follow-up reviews for grantees in their home region.
- Each delegate will be reviewed as part of each triennial and first-year review.
- The interview “protocols” (denoted as such in the FY 2005 Guide) are renamed to interview “guides,” and the previously designated optional interview guides have been eliminated. .

REVIEWER INFORMATION AND RESOURCES APPENDICES

The Code of Conduct for Head Start Reviewers has been updated for FY 2006. The URLs listed in the Resources List Appendix were updated to ensure that all are accurate and the Web sites remain in working order.

PRISM Overview

The *Guide* provides an overview of the Federal monitoring process for Head Start and Early Head Start programs and provides guidance to Federal and non-Federal Team Leaders (Team Leaders), review team members, grantees and Regional Office staff regarding the conduct of reviews.

The *Guide* is divided into the following six chapters:

- What's New in the Fiscal Year 2006 PRISM Guide;
- PRISM Overview;
- Advance Activities;
- On-site Activities;
- Grantee Notice: The Head Start Review Report; and
- Program Improvement and Corrective Action.

Four appendices are included at the end of the *Guide*:

- *PRISM Instrument*;
- Forms;
- Reviewer Information; and
- Resources

This chapter, PRISM Overview, begins with a brief background on Head Start and program monitoring. The remaining sections of the chapter summarize the elements of the PRISM monitoring process.

BACKGROUND: HEAD START AND PROGRAM MONITORING

The Head Start Program, which is authorized under the Head Start Act, provides grants to local public and private nonprofit and for-profit agencies to provide comprehensive child development services to economically disadvantaged children and families, with a special focus on helping children develop the early literacy and numeracy skills they need to be successful in school. Intended primarily for preschoolers from low-income families, Head Start promotes school readiness by enhancing the social and cognitive development of children through the provision of educational, health, nutritional, social, and other services. Head Start programs emphasize cognitive, language, and socio-emotional development to enable each child to develop and function at his or her highest potential. At least 10 percent of the enrollment opportunities in each program must be made available to children with disabilities.

Head Start engages parents in their children's learning and helps them in making progress toward their educational, literacy, and employment goals. The Head Start program also emphasizes significant involvement of parents in the administration of local Head Start programs. In 1995, the Early Head Start program was established in recognition of the mounting evidence that the earliest years, from birth to three years of age, matter a great deal to children's growth and development.¹ The central purpose of the Head Start program is the promotion of “school readiness by enhancing the social and cognitive development of low-income children through the provision, to low-income children and their families, of health, educational, nutritional, social, and other services.”² Program monitoring is intended to ensure that such services are provided by enforcing compliance with all Head Start program requirements.

Head Start is administered by the Head Start Bureau of the Administration on Children, Youth and Families (ACYF). ACYF is a part of the Administration for Children and Families (ACF) within the Department of Health and Human Services (HHS). Head Start program requirements are specified in legislation (i.e., the Head Start Act and other Federal, State and local statutes) and in various Federal, State, and local regulations and other requirements. (Regulations are rules issued by governmental agencies that implement statutes and have the force and effect of law.) The set of regulations that pertain to Head Start and Early Head Start programs includes the Head Start Program Performance Standards (Performance Standards), other Head Start regulations, and other relevant Federal, State, and local regulations.³

The Head Start Act mandates that each Head Start grantee receive a full on-site monitoring review at least once every three years, that each new program be reviewed after the completion of its first year (and then at least every three years thereafter), and that follow-up reviews be conducted for grantees that “fail to meet the standards.”⁴ During a monitoring review, a team of qualified reviewers, supervised by a Team Leader, assesses compliance with program requirements.

WHAT IS PRISM?

PRISM is both a set of instruments and the process used to conduct Federal monitoring of Head Start grantees. PRISM was developed as part of an effort to integrate the 1998 revisions to the Performance Standards into the monitoring process.⁵

PRISM organizes elements in the Performance Standards and other program regulations into **Core Questions**. The Core Question framework is designed to facilitate monitoring compliance

¹ Throughout the *PRISM Guide*, “Head Start” is used to include both Head Start and Early Head Start programs, unless otherwise specified. Both programs are authorized under the Head Start Act (42 USC 9831, et seq.).

² 42 USC 9831 (Section 636 of the Head Start Act)

³ Strictly speaking, the Head Start Program Performance Standards are contained in 45 CFR Part 1304, and the Head Start Program Performance Standards on Services to Children with Disabilities are contained in 45 CFR Part 1308. Other rules and requirements applicable to Head Start, such as those relating to grants administration, eligibility and enrollment, program staffing, and other topics are contained in 45 CFR Parts 1301, 1302, 1303, 1305, 1306, 1309, and 1310.

⁴ 42 USC 9836A (c)(1)(C).

⁵ The revisions to the Performance Standards were finalized in November 1996 and took effect on January 1, 1998. For more information on the development of the Performance Standards, see the discussion in the Preamble to the Final Rule (*Federal Register*, Vol. 61, No. 215 (November 5, 1996))

with the broad array of program requirements. Each Core Question identifies a set of related questions with guidance on how to gather information to best respond to these questions, with the ultimate goal of providing the review team with evidence to support compliance decisions for the set of program requirements related to each Core Question.

The program requirements are organized into nine questions that emphasize a program's *service delivery*, and nine that focus on the program's *systems* in place to support the delivery of services to Head Start children and their families. Service area core questions include: Prevention and Early Intervention; Individualization; Mental Health; Disabilities; Curriculum and Assessment; Family Partnership Building; Parent Involvement; Community Partnership; and Facilities, Materials, Equipment and Transportation. Reviewers with primary responsibility for the program requirements categorized into these Core Questions are the **Service Reviewers**.

Systems area core questions include: Program Governance; Planning; Communication; Record Keeping and Reporting; Ongoing Monitoring; Self-Assessment; Human Resources; Fiscal Management; and Eligibility, Recruitment, Selection, Enrollment, and Attendance. **Systems Reviewers** have primary responsibility for the requirements related to these Core Questions. While Service Reviewers and Systems Reviewers assume primary responsibility for specific Core Questions, all reviewers work collaboratively in addressing all Core Questions and assessing compliance with applicable program requirements.

A sample Core Question layout (from the Core Questions section of the *PRISM Instrument*) is shown in Figure 1. The Core Question number and title appear at the top of the page; the top left portion of the page contains the full text of the Core Question. The top right section of the page includes citations for the program requirements applicable to the Core Question. The bottom portion of the page includes instructions on how reviewers gather information pertinent to the program requirements applicable to that particular question.

Figure 1.—Sample Core Question Layout

QUESTION 1. PROGRAM GOVERNANCE	STANDARDS
<p>How effective is the grantee's system of shared governance in supporting the implementation of quality services to children and families?</p> <p>How does the system ensure:</p> <ul style="list-style-type: none"> • a governing body that participates in key decision-making and oversight for the program, including the formation of the Policy Council structure and function? • a formal structure of policy groups and Parent Committees with appropriate composition and process of formation? • the assignment of appropriate governing body and policy group responsibilities, including the development, review, and approval/disapproval of program policies and procedures? • written internal dispute resolution procedures for conflicts between the governing body and policy group? • inclusive and well-functioning Parent Committees? 	<p>1304.50, including Appendix A—Governance and Management Responsibilities; 1304.52 (k)</p>
<ul style="list-style-type: none"> • REFER TO—Information on governance gathered from the Management Team Interview, Content Area Experts Interview, Staff Group Interview, Family Group Interview, Governing Body Interview, and Policy Council Interview. • OBSERVE—Policy Council meeting. • INTERVIEW—As needed, any additional governing body and policy group members, and staff. • REVIEW—Policies and procedures pertaining to governance; written definitions of roles and responsibilities of governing body members; evidence of training; governing body and Policy Council bylaws; selection of minutes of governing body, Policy Council, Policy Committee, and Parent Committee meetings; and grantee and delegate agency agreements (if applicable). 	

The **PRISM Instrument** is a compendium of tools that review team members use to gather data to address the Core Questions and measure compliance with applicable program requirements. The specific tools contained within the **PRISM Instrument** include:

- The set of 18 Core Questions;
- Protocols, developed for Health and Nutrition, Disabilities, Mental Health and Early Childhood Development (expected in the first quarter of FY 2006) service areas, that provide guidance to help reviewers address the primary standards related to the relevant service areas.
- Guides for interviewing Head Start families, Policy Council and Governing Body members, and child care and other community partners; and
- Instruments and checklists for recording observations during visits to classrooms, homes, and other locations.

HOW DOES THE PRISM PROCESS WORK?

Fundamental to the PRISM process is the review team's collection, verification, and analysis of evidence from multiple sources to establish relevant facts. Team members share information during the course of the review (collaboration is facilitated by the PRISM 2006 software and nightly team meetings) and follow up on initial findings or issues for which sufficient evidence has not yet been identified to make a preliminary compliance decision. Based on the analysis of the evidence and recommendations, the Team Leader makes preliminary decisions regarding

grantee compliance with program requirements. These decisions are finalized by the HHS official or designee who issues the Head Start Review Report, and are documented in the report. The report communicates to the grantee final compliance decisions and timeframes for corrective action.

The monitoring process is comprised of four phases: Advance Activities, On-Site Review, Grantee Notice: the Head Start Review Report, and Program Improvement and Corrective Action. The PRISM Instrument and PRISM 2006 Software are designed to facilitate information collection, analysis and reporting at each phase of the monitoring process.

Four Phases of the Review Process

The four phases of a grantee review process include (each of these phases is described in more detail in subsequent chapters):

- **Advance Activities.** Activities during this phase include making logistical arrangements, requesting and assigning reviewers to a review team, selecting centers and settings, and identifying focus children and families.
- **On-Site Activities.** Activities during this phase include information collection and verification to establish facts, including document reviews, observation of children in different settings, interviews, and grantee briefings. During this phase, reviewers communicate and collaborate with one another during the day and participate in team meetings each evening to (a) share and analyze information, and (b) develop preliminary findings. During the final stage of this phase, the team, under the direction of the Team Leader, prepares a preliminary report of areas of noncompliance.
- **Grantee Notice: The Head Start Review Report.** The HHS official or designee issuing the Head Start Review Report finalizes compliance decisions and develops and delivers to the grantee the Head Start Review Report, which is generated directly from the PRISM 2006 Software. The Head Start Review Report has been redesigned and reformatted for FY 2006. The Head Start Review Report will be mailed to the grantee governing body president promptly following conclusion of the on-site review. The timeframe will necessarily vary depending on the complexity of the review.⁶
- **Program Improvement and Corrective Action.** This phase includes corrective action by the grantee, development of Quality Improvement Plans (QIPs), training and technical assistance (T/TA), and documentation in the PRISM 2006 Software of the outcomes of corrective action(s) for all areas of noncompliance and deficiencies.

Systems Approach: Integration of Systems and Services

PRISM employs a "systems approach" to monitoring because strong systems are essential to maintaining Head Start program quality. Under this approach, failures within service areas may not only reflect failures to deliver mandated services to children and families, but also may indicate the presence of underlying systems problems. PRISM focuses on how a grantee's

⁶ The Head Start Program Performance Standards require that the grantee be notified "promptly" in writing of any noncompliance or deficiency (see 45 CFR 1304.61(a) and 45 CFR 1304.60(b)).

systems, services, and partnering activities interact to create and maintain a quality program. The PRISM 2006 Software is designed to facilitate collaboration among review team members to identify potential system issues that are related to a given service issue or other systems issues.

Focus Child and Family Process

Through the focus child and family process, reviewers use various PRISM tools and protocols to examine the actual experiences of a group of Head Start children and their families from the time they entered Head Start to the present. This multifaceted view of the experiences of a selection of children and their families allows reviewers to see how the grantee integrates systems and services.

Review Team Collaboration

Reviewers share information with each other both throughout the day and during nightly team meetings. The PRISM 2006 Software facilitates collaboration by enabling review team members to synchronize computers with one another (off-line, using routers and cables), thus sharing all information recorded for a particular review (this includes information recorded on a grantee and all of its delegate agencies). Review team members operating in remote locations without direct contact with other team members can synchronize their computers with the PRISM 2006 web site, through which the team and the remotely located team member can exchange information. Team members without a computer or PC tablet will conduct the review through hard copy paper documentation and, as in the past, all reviewers will share information in team meetings. In circumstances in which review team members do not have access to a computer, the Report Coordinator will record in the PRISM Software any issues raised during the team meeting, including potential issues that require further evidentiary support before making a preliminary area of noncompliance recommendation, as well as actual preliminary areas of noncompliance (where sufficient evidence exists to support such a finding).

In addition to using the software, ongoing daily communication may take the form of either cell phone calls or e-mail correspondence between service reviewers at different sites, or between a service reviewer who has observed a service delivery failure(s) and a systems reviewer to alert the latter of possible underlying systems problems. Reviewers are encouraged to refer to the Danya website (<http://www.headstartreviews.com>) for information on allowable cost policies and reimbursement procedures for such communications.

Team meetings are the arena in which reviewers analyze evidence that supports findings that grantees are out of compliance with applicable program requirements; for Report Coordinators to integrate data into a preliminary Review Report; and for Team Leaders to ensure that the monitoring review is complete and comprehensive. Team meetings are analytic sessions through which review team members share information, integrate their individual observations and data gathering, identify interrelationships among systems and services, and discuss additional information collection and verification needed to establish relevant facts and circumstances. The Team Leader supervises the work of the group during team meetings, facilitates discussions, and assigns reviewers to follow up on issues identified during meetings.

Advance Activities

This section describes the process of coordinating and preparing for the on-site review. Grantees, reviewers, Federal and non-Federal Team Leaders, program specialists, and contractors supporting the Head Start Bureau participate in the Advance Activities phase of the review. Each plays a distinct role and contributes to the success of the review process and the monitoring system. The primary goals of this phase are to:

- Provide grantees with an opportunity to report on self-assessment and ongoing monitoring activities;
- Allow for efficient and effective coordination of the on-site review;
- Provide review team members with a general understanding of the grantee's organizational, governance and management structures, its fiscal operations and standing, and the general population of children and families the grantee serves; and
- Allow the review team to maximize time available for collecting and verifying information related to program, administrative, financial management, and other Head Start requirements that is only available on-site.

IDENTIFYING GRANTEES FOR TRIENNIAL OR FIRST-YEAR REVIEWS

In September 2005 the Head Start Bureau or designee will send a letter to all grantees due for a first-year or triennial review under 42 U.S.C. 9836A (c)(1)(A) and (B). The letter informs grantees that they are scheduled for a review (first-year or triennial).

GRANTEE SELF-ASSESSMENT AND ONGOING MONITORING

Grantee activities focusing on self-assessment and ongoing monitoring are not only mandated by regulation, but provide information to guide grantees' plans for training/technical assistance, programmatic changes and system improvements and, ultimately, improve the quality of services provided to children and their families. While the PRISM on-site review monitors program performance on a triennial basis, self-assessment and ongoing monitoring inform program improvements on a more regular basis prior to and following the on-site review.

- The annual self-assessment provides grantees with opportunities for detecting and addressing program weaknesses in advance of the PRISM review. While the PRISM review process provides an external assessment of Head Start programs to determine compliance with Head Start requirements, grantees are required to conduct a self-assessment on an annual basis under 45 CFR 1304.51(i)(1). One recommended tool for conducting a Head Start Program self-assessment can be found at the following Internet link: http://www.headstartinfo.org/self_assessment/table_of_contents.htm.
- Pursuant to 45 CFR 1304.51(i)(2), grantees are required to establish and implement procedures for ongoing monitoring activities to ensure that Head Start operations implement Federal regulations. Such ongoing activities should routinely inform grantees of their level of compliance and should, therefore, function as predictors for the results of

on-site reviews.

ADVANCE FISCAL REVIEW

Fiscal Reviewers have typically arrived ahead of the review team to begin reviewing fiscal documents. Where that is determined to be necessary, the Team Leader will contact the grantee director to request that specific fiscal documentation pertinent to the Head Start grant award, listed below, be delivered to the review team's hotel no later than the Saturday afternoon before the review is scheduled to begin. The intent of this advance review is to ensure that Fiscal Reviewers have a fuller understanding of the grantee's fiscal operations prior to the beginning of the On-Site Activities phase of the review; it is not intended to substitute for the in-depth review of fiscal information that will be conducted on-site.

The grantee director should certify that the following documents will be made available in advance for the Fiscal Reviewer:

- The grantee's external audit reports and accompanying management letters for the past three years;
- If conducted, internal audit reports for the past three years;
- The grantee's current and prior year Financial Assistance Awards (FAAs), including all construction and renovation awards;
- Most recent financial reports as delivered to the governing bodies;
- Organizational chart, list of staff and function of each staff person, including any vacancies;
- The grantee's Policies and Procedures manual(s) covering fiscal operations, including accounting and procurement policies and procedures;
- The grantee's current indirect cost agreement and cost allocation plan;
- All lease agreements;
- The grantee's most recent final SF-269 (Financial Status Report) and PMS-272 (Federal Cash Transaction Report) with supporting documentation;
- Current insurance policies;
- Grantee's most recent IRS 990, if applicable;
- All current contracts or other agreements with consultants; and
- Current administrative costs documentation.

Community Partnership Information Form

As in FY 2005, in FY 2006 the Community Partnerships Information Form can be used to help reviewers gain background information and knowledge about the types and roles of the community partnerships present in the Head Start/Early Head Start programs prior to the community partners' interview. Once the Team Leader identifies a representative cross-section of participants for the Community Partnerships interview and notifies the grantee, the grantee should send the Community Partnerships Information Form to the selected participants and request its completion and prompt return to the grantee. The grantee should forward the completed forms to the Team Leader for dissemination to pertinent reviewers (the Team Leader may decide if the completed forms should be sent along with other documents in advance of the review, or if the reviewers will have access to the forms at the first team meeting on Sunday or Monday morning at the grantee's office).

LOGISTICAL COORDINATION

Approximately one month prior to the scheduled review, the assigned Team Leader will contact the grantee to introduce himself or herself and notify the grantee of the scheduled review dates. At this time the Team Leader will discuss arrangements for the meetings and interviews, as well as for the document and file reviews that will occur during the On-Site Activities phase of the review. For meetings and interviews, such logistics typically include specifying the dates and times during which the meetings and interviews will occur, identifying participants for each of the meetings and interviews, identifying locations where the meetings and interviews will be conducted, specifying any materials or equipment required (e.g., flip-chart stand and flip-chart paper, pens, extension cords for laptop computers, projection screen, overhead projector, or LCD projector), identifying any reasonable accommodations needed by grantee or review team participants, and arranging for transportation (e.g., transporting parents, children, and grantee staff to and from meetings and interviews and transporting review team members to and from classrooms, centers, and other locations), as applicable.

ASSIGNING REVIEWERS AND TEAM LEADERS TO REVIEWS

The Monitoring Support Contractor is responsible for assigning Team Leaders and review team members to reviews. Several new Bureau initiatives aimed at streamlining and improving the monitoring process have implications for the assignment of review teams. As indicated earlier, effective in FY 2006, Federal Team Leaders will not lead reviews of grantees located within their home region. While Team Leaders now will review grantee programs located in different regions, effort will be made to assign Team Leaders to reviews scheduled within one time zone of their home Regional Office. Another significant improvement is that the on-site review of every delegate agency will take place concurrent to the grantee review. Every one of a grantee's delegate agencies (as applicable) must be visited during the scheduled review. Grantees with a large number of delegates, especially the so-called "super-grantees," may require reviews of extended duration.

Review Team Composition

Together, review team members must have the expertise to review all 18 Core Questions. Specific areas of expertise may include:

- Early Childhood Development (ECD);

- Health (HEA);
- Mental Health (MH);
- Disabilities (DIS);
- Infant and Toddler Child Development (ITCD);
- Infant and Toddler Disabilities (ITD);
- Infant and Toddler Maternal and Child Health (MCH);
- Family and Community Partnerships (FCP);
- Program Design and Management (PDM);
- Facilities (FAC);
- Fiscal Management (FIS); and
- Report Coordination (RC).

Guidelines for Assigning Individual Reviewers to Review Teams

The Bureau has increased efforts to ensure that all reviewers meet minimum requirements for education and experience in their respective areas. Only qualified reviewers will be assigned to review teams. During FY 2006 a certification process will be developed to strengthen the reviewer pool.

Individual reviewers also are assigned using the following guiding principles:

- Reviewers who are employees of a Head Start grantee or delegate agency are limited to participating in a maximum of three reviews per year.
- Reviewers not employed by a Head Start grantee or delegate agency are limited to participating in a maximum of 20 review teams per year.
- Staff employed by a grantee or employed by a delegate of a grantee identified as deficient cannot participate on a review until the deficiencies have been resolved.
- Reviewers cannot review programs within their home state; they may only participate in reviews outside of the state in which they live.
- New reviewers will be placed on teams with coach reviewers to assist the new reviewers to learn their responsibilities.

More detailed information on reviewer qualifications is contained in the Reviewer Information Appendix.

Assigning Review Team Members to Core Questions and Review Activities

Danya Review Planners assign to each reviewer lead and support roles on Core Questions related to reviewers' respective fields of expertise. Core Question responsibilities should be assigned to ensure that (a) all systems, services, and partnerships are covered, and (b) team members are assigned to make best use of their knowledge, skills, and experience. Of note, Fiscal Reviewers must only be assigned responsibility for the Fiscal Management Core Question. Fiscal Reviewers should neither take the lead on other Core Questions nor engage in review activities that are not related to the grantee's fiscal management system. This policy helps ensure that Fiscal Reviewers have adequate time to review a grantee's fiscal operations.

Danya staff will record the review team member Core Question assignments within the PRISM Software. Team Leaders can modify core question assignments as necessary to respond to changes in review team composition. Team Leaders can use the PRISM 2006 Software to assign reviewers to activities (e.g., protocols, check lists, etc.). The web application guides Team Leaders through the activity assignment process. For those Team Leaders using hard copy tools to assign review team members to review activities, once the Review Planner has notified them of the confirmed list of review team members and their Core Question assignments, the Team Leader should record the information in the Team Assignment Worksheet. The Team Assignment Worksheet summarizes general assignments of responsibility and specific assignments for review activities. A blank form can be found in the Forms Appendix. A brief description of the worksheet's components follows:

- The worksheet provides space to summarize responsibilities for the Core Questions. Next to each of the 18 Core Questions, the Team Leader can record the name of the lead reviewer and the names of reviewers who will support the lead reviewer in gathering information and writing the preliminary areas of noncompliance.
- Following the set of Core Questions, the worksheet lists the meetings that occur during the initial day(s) of the review. The following guidelines apply:
 - Team Leaders should use discretion in assigning individuals to interviews in order to maximize the time that reviewers have to conduct data-gathering activities related to their area of expertise;
 - For each meeting, the Team Leader should record who will attend, when the meeting will be held, and where it will occur;
 - If there are special roles for individuals (e.g., facilitator and note taker), there is space to write in the names of reviewers who will assume those roles; and
 - In keeping with the effort to ensure that Fiscal Reviewers have adequate time to review a grantee's fiscal operations, Team Leaders should assign Fiscal Reviewers to participate only in those meetings and interviews that address fiscally relevant issues. While the Team Leader has discretion in making such assignments, it is expected that the Fiscal Reviewer would attend, at a minimum, two interviews: (1) the Governing Body Interview and (2) the Policy Council Interview.

- Following the section on interview assignments, the worksheet lists checklist and additional meeting assignments, including team meetings and grantee briefings. Spaces are available to record meeting and checklist assignments, meeting/observation schedules and locations.
- The final page of the Team Assignment Worksheet contains an area to help plan focus children and family assignments. This section aims to capture all of the necessary information the review team may need about the focus children and their families, including the child's location, age, program option, presence of a disability, language spoken, parents' names and interviews each are attending, and siblings' names (if applicable).

This more detailed listing of information for each of the focus children and their families, by classroom, is intended to minimize effort in coordinating review team logistics. Note that the focus child and family information table is split into two sets of columns. The first eight columns consist of the focus child and family background information and should be filled out by the grantee. The last two columns regarding reviewer assignments and observation times may be filled out by the review team. Additionally, as this form requires the grantee to complete a certain amount of information for each focus child and family, this table should be completed only after the list of focus children has been finalized. Refer to the next section for more information regarding the setting and focus child selection processes.

SELECTION OF SETTINGS, FOCUS CHILDREN, AND INCOME ELIGIBILITY FILES

This section discusses the selection process undertaken by Team Leaders to make a solid, reasoned judgment of the settings to visit and the children on whom to focus. It is not necessary to visit all centers and classrooms of a grantee to determine the effectiveness of the grantee's systems or services. For most grantees, it will not be possible to visit all family child care homes or accompany all home visitors. The selection process is designed to allow the team to monitor the effectiveness of systems and the implementation of services and partnerships in all types of settings.

As indicated previously, beginning in FY 2006 every delegate agency will be reviewed when a grantee with delegate agencies is scheduled for a first-year or triennial review. Every delegate will receive an on-site review; however, the Head Start Bureau will determine the scope of the review of each delegate.

The Selection Process document in the Forms Appendix provides a step-by-step methodology for Team Leaders to prepare for a review. The *Selection Tree Form* offers instructions for selection at three different levels: (1) centers or geographic areas; (2) classrooms, family child care homes, and home visitors; and (3) focus children and their families. A blank *Selection Tree Form* may be found in the Forms Appendix.

Selecting Centers or Geographic Areas. The Team Leader selects the centers and geographic areas that the reviewers will visit. The sites selected should include a representative cross-section of the grantee's program, including its diversity of families served, ages served, and program options. For example, it is important to include, to the extent possible, an Early Head Start site, a child care partnership, and a home-based option.

Selecting Classrooms, Family Child Care Homes, and Home Visitors. The Team Leader can randomly choose classes within selected centers or home visitors within a geographic area.

Selecting Focus Children and Their Families. The Team Leader will select the children and their families that will be a focus of the data-gathering activities during the On-Site Activities phase of the review. As part of this process, the Team Leader may ask the grantee to provide enrollment rosters or class lists, or the Team Leader may ask the grantee to choose one to four children in each class—one to be a focus child and the others to act as back-ups. At a minimum, focus children and families should include children enrolled in each classroom and family child care home to be visited. It is not expected that every program activity will be represented by every family, but rather that the experiences of the group of children and families chosen will give reviewers a comprehensive view of how the program works. Careful attention should be given to ensure that the children selected reflect the age groups served as well as (1) families involved in child care partnerships and (2) children with disabilities, including at least one child with more significant disabilities. Typically, each Service Reviewer is assigned three to five focus children and their families by the Team Leader.

Selecting Files for Income Eligibility Review. A sample of children's files will be reviewed using the Income Eligibility Data Collection Form located in the *PRISM Instrument*. Please refer to the Income Eligibility Process and Data Collection Form Instructions located in the *PRISM Instrument* for a more detailed description of this process.

On-Site Activities

The On-Site Activities phase of the review is mandated by the Head Start statute and is required to include “a review and assessment of program effectiveness.” In order to “determine whether Head Start agencies meet standards with respect to program, administrative, financial management, and other requirements,” the review team gathers and verifies information from multiple sources using multiple methods. Head Start monitoring reviews are compliance reviews intended to monitor grantee programs against current regulations and program requirements. Review team members must collaborate to identify programs that fail to meet Head Start standards. Given the volume of documents to review, the number of individuals to interview and the potential geographic dispersion of facilities to observe, collaboration is critical to create a comprehensive assessment of each program’s services, systems, and any interrelationships thereof. The Team Leader supervises on-site review activities and makes preliminary decisions regarding grantee compliance based on documented facts.

During this phase of the review, information is collected through group and individual interviews, file and other record reviews, and observations at centers and other settings. Reviewers exchange information during the day and during nightly team meetings.⁷ The PRISM 2006 Software is designed to facilitate and enhance communication and collaboration among members of the review team. The software enables each reviewer to electronically document information they collect; all instruments (i.e., protocols, core question pages, etc.) are available electronically in the software. Review team members may synchronize their computers, transferring information from one computer to another and thereby allowing the team to electronically monitor the evidence related to a particular core question or, more specifically, a given issue over the course of the review.

The Report Coordinator and Team Leader ensure that all review findings are substantiated and thoroughly evaluated. At the end of the on-site review phase, the Team Leader will be in a position to recommend preliminary areas of noncompliance.

ON-SITE TIME REQUIREMENTS FOR REVIEW TEAM MEMBERS

The on-site phase of the review typically requires one week to complete, beginning on Sunday evening with a review team planning meeting and ending Thursday evening or Friday morning with the completion of all writing of preliminary areas of noncompliance. The following circumstances may require additional on-site time:

- Fiscal Reviewers typically are encouraged to arrive one day early to the site to allow for sufficient time to thoroughly review the grantee’s fiscal operations.
- Team Leaders and Report Coordinators are authorized to remain on-site through Friday, if needed, to complete the preliminary report, ensuring its accuracy, comprehensiveness, and clarity.

⁷ Effective in FY 2006, the PRISM process no longer includes a summary meeting. The grantee entrance meeting remains part of the PRISM process, but will no longer include a grantee presentation.

- Each reviewer responsible for a written preliminary area(s) of noncompliance is required to ensure that the product is of acceptable quality to the Report Coordinator and Team Leader prior to the reviewer's departure from the on-site review. Failure to ascertain this acceptance may result in reduced payment to a reviewer if a claim of an unacceptable submission is determined to be valid. Reviewers with shared responsibility for documenting a preliminary area of noncompliance are equally accountable for the final submission.
- The duration of the on-site phase of the review may extend beyond the aforementioned timeframe for reviews of grantees with a large number of delegate agencies. As indicated previously, a new FY 2006 policy requires that every delegate agency must receive an on-site visit when its granting agency is reviewed.

PHILOSOPHY OF PERFORMANCE

During all phases of the review, and most critically during the On-Site Activities phase of the review, review team members are reviewing and assessing program effectiveness and quality. The expectation is that Head Start programs will comply with all statutory, regulatory, and other requirements of the Head Start grant award. When there are failures to meet Head Start standards, the review team will document and report such failures. While monitoring reviews, by their nature, are focused on determining the extent of compliance with Head Start requirements, it is of paramount importance that reviews are carried out without any preconceptions or prejudgments. To ensure fairness and objectivity, all review team members should:

- Show respect for grantee staff at all times;
- Value the time that grantee staff spends with reviewers by coordinating review team activities to minimize or eliminate multiple queries or requests for information;
- Consult with appropriate grantee staff as soon as possible when gaps in information arise that require additional data or explanation; and
- Keep communication as open as possible.

FACT-BASED, SYSTEMS-BASED MONITORING

The PRISM process is designed to provide the Head Start Bureau and Regional Offices and, ultimately, grantees with information grounded in verifiable evidence. The review team's primary responsibility is to collect evidence (i.e., information that provides a basis for reaching a conclusion or judgment) regarding service delivery, program operations and governance, and other elements of the program. Information is collected and verified through multiple methods and multiple sources. Methods by which evidence is collected include:

- Observing children in home and classroom settings;
- Interviewing individuals involved in the receipt, delivery or management of services; and
- Reviewing documents.

Sources through which information may be collected include children, parents, teachers,

children's files, buses, and playgrounds. Each review team member is accountable for the accuracy of all pre-decisional information he or she reports as evidence of an issue, whether that information is conveyed verbally (e.g., during team meetings or other discussions with review team members), electronically or in writing.

As potential findings are identified through observations, interviews and document reviews, it is critical that team members collaborate with other service and/or systems reviewers. Information sharing enables the team to provide a more comprehensive description of identified weaknesses within the program. For example, safety issues identified at center playgrounds may suggest a problem within the program's management systems. The PRISM monitoring process, particularly the nightly team meetings and redesigned PRISM software, is designed to stimulate collaboration and discussion among team members.

COLLECTING INFORMATION

Using the *PRISM Instrument*, in particular the new service area protocols, reviewers are responsible for making preliminary recommendations about grantee compliance with Head Start program requirements by:

- Collecting information, and verifying and confirming the accuracy of the information collected;
- Recording all information collected on-site within the PRISM software;
- Sharing information with other review team members during the day and during team meetings and ensuring that interrelationships among systems, services, and partnerships are identified and assessed;
- Integrating data and making preliminary recommendations to the Team Leader; and
- Reporting the results.

Information-collecting responsibilities of team members differ, depending on their specific roles during the review. All review team members must, however, participate in the Review Team Planning Meeting and the Entrance Meeting so that everyone shares the "big picture" of the grantee and its services and partnerships.

- **The Review Team Planning Meeting** occurs prior to meeting with grantee staff, usually the evening before the first day of the On-Site Activities phase of the review. The purpose of this meeting is to describe the grantee and any delegates being reviewed, discuss assignments and the schedule of events of the review, and clarify the Team Leader's expectations. Since this is the first time the entire review team meets as a whole, it is a good opportunity to coordinate the team's planned interactions with focus children and their families. Specifically, the Team Leader should complete the last two columns on the Team Assignment Worksheet (in the *Forms Appendix*) regarding the logistics surrounding the observation of focus children and their families. Additionally, this meeting provides a good opportunity to make Transportation Services Checklist and Income Eligibility Data Collection Form assignments. Note that the Team Leader may use the web application of the PRISM 2006 Software to complete these assignments prior to the On-Site phase of the review.

- **The Entrance Meeting** is an informal introductory session for the review team to meet key grantee staff. It can include a welcome from the grantee director, an introduction of staff, and an overview of the organization of the agency. It can also include an introduction of review team members and a brief overview of the on-site activities planned for the week. During this meeting, the review Team Leader should exchange contact information with key grantee staff with whom they will be working during the on-site review.

Collecting Information: All Reviewers

- All review teams must enter **funded and actual enrollment data** into the PRISM Software for inclusion in the Head Start Review Report. Enrollment data should be entered for all triennial and first-year reviews.
 - For the grantee's "funded enrollment," enter the figure contained on the grantee's Financial Assistance Award (FAA) for the current period.
 - For the grantee's "actual enrollment," enter the number of children enrolled in all Head Start and Early Head Start programs during the week of the on-site review. When capturing actual enrollment figures, adhere to the following:
 - If the review takes place within the last 60 days of the program year, enter the number of children enrolled during the week immediately *prior* to the start of that 60-day period.
 - Count as “enrolled” any slots vacated by children within the past 30 days.
- All review teams must complete the **Delegate Agencies Checklist** in the fiscal year 2006 PRISM Software. Effective in FY 2006, the information entered into the Delegate Agencies Checklist will be automatically stored in the electronic record of the review of delegate agencies for each grantee (i.e., for grantees with delegate agencies). The Report Coordinator for the grantee review should be responsible for completing the Delegate Agencies Checklist for the review.
- All review teams must complete the **Income Eligibility Data Collection Form**, designed to assist reviewers in assessing compliance with income eligibility requirements. Completion of this form requires the review of a small sample of randomly selected files. The Income Eligibility Data Collection Form (with instructions) is located in the PRISM Instrument Appendix. This form has been modified slightly.
- All review teams must complete the **Transportation Services Checklist**, whether or not the grantee provides transportation services.
- All review teams must interview the appropriate grantee staff to determine whether the grantee has any current compliance issues and/or corrective action plans in effect concerning other Federal, state or local regulations or other program requirements.

Collecting Information: Service Reviewers

Service Reviewers monitor compliance with program requirements by examining grantee service delivery and partnership activities. Service Reviewers also participate in the focus child and family process. During this process, Service Reviewers use a variety of PRISM instruments and protocols to examine the actual experiences of Head Start children and their families.

Service Reviewers must address information on nine Core Questions: Prevention and Early Intervention and Health Care Tracking and Follow Up; Individualization; Mental Health; Disabilities Services; Curriculum and Assessment; Family Partnership Building; Parent Involvement; Community Partnerships; and Facilities, Materials, Equipment, and Transportation. Working closely as a team, Service Reviewers coordinate specific review assignments. Tasks assigned to Service Reviewers may extend beyond their primary areas of expertise. Specific assignments for Service Reviewers include:

- *Using Protocols.* New protocols focus on the following areas: health, nutrition, disabilities, mental health, and early childhood development. The Health, Nutrition, and Disabilities protocols will be available with the release of this *Guide*. The Mental Health and Early Childhood Development Protocols will be available during the first quarter of FY 2006. These new protocols are designed to assist reviewers in organizing data-gathering activities around the performance standards and, ultimately, outline the process for collecting evidence related to the specified standards. The protocols are the primary tool for assisting service reviewers to monitor compliance with performance standards within their content area. Other tools (e.g., interview guides and checklists) may continue to be used for additional support.

The protocols provide a series of questions and prompts that, when addressed, assist in assessing program effectiveness and in making preliminary compliance decisions. In addition, the protocols list the documents to be reviewed, people to be interviewed, and settings to be observed to help the reviewer address each of the standards. The accompanying protocol worksheets provide a means for recording relevant information, including people interviewed, documents/records reviewed, and observations made. In addition, several protocols include a reference document that identifies the relationship between the protocol and other interview guides, checklists, forms, and PRISM processes.

At the end of the review, the designated reviewer is required to complete and submit the protocol worksheet, which documents the methods and sources through which information was collected while on-site (i.e., the individuals with whom they spoke, documents reviewed, and observations made). The worksheet is designed to provide reviewers with a place to document information acquired from the sources, which may become evidence in support of a preliminary area of noncompliance.

- *Observing in children's settings.* Service Reviewers observe their focus children in their center or home settings in order to get an overall picture of their environment, interactions, and curriculum activities. These observations are integral to the focus child and family process. Service Reviewers use one of the two observation instruments in PRISM to record their observations. Several tools have been developed to guide

reviewers on what to observe, and facilitate the recording of information based on these observations.

- The **Classroom, Family Child Care, or Socialization Experience Observation Instrument** is used to record observations of a classroom or a socialization experience that is part of a home-based option.
- The **Home Visit Observation Instrument** is used to record a reviewer's observations during home visits that are part of the home-based option.
- A **Health and Safety Checklist** (revised slightly in FY 2006) is used for each of the group settings in which the reviewer observes. Reviewers should pay special attention to ensure facilities comply with all Federal, State, and local licensing requirements. All review teams are required to complete this checklist.
- The **Transportation Services Checklist** provides guidance on reviewing transportation services. All review teams must complete this checklist, regardless of whether the program provides transportation services to children.
- *Conducting or participating in interviews.* Service reviewers interview a variety of individuals involved in the provision or receipt of services, including education staff—teachers, home visitors and others—who provide services to focus children as well as family service staff who work with focus families. In addition, service reviewers participate in other individual and group interviews. At the discretion of the Team Leader, Service Reviewers may participate in any of the scheduled group interviews. In particular, it may be helpful for at least one Service Reviewer to attend the following interviews:
 - **Family Group Interview.** This interview is an integral part of the focus child and family process. The purpose of the Family Group Interview is to review and assess the Head Start experiences of focus families. All focus families should be invited to attend the interview. Reviewers should make every effort to talk to members of all focus families during the review, including those who are not able to attend the Family Group Interview, so that there is a broad representation of parents in the review process. Alternative ways to contact parents who are not able to join the interview include telephone calls in the evening, speaking with parents when they drop off or pick up their children, or going on a bus ride.
 - **Community Partnerships Interview.** This interview is conducted with staff from agencies that work in partnership with Head Start. It may be appropriate to ask both Systems and Service Reviewers to attend the interview to ensure that issues related to systems, services, and partnerships are covered. Background information for this interview will be provided in the completed Community Partnerships Information Form and should be reviewed by the reviewers conducting this interview.
 - **Child Care Partnerships Interview.** Designed for use with Head Start child care partners, this interview assists reviewers in understanding the development and implementation of the grantee's child care partnerships. It may be appropriate to ask

both Systems and Service Reviewers to attend the interview to ensure that issues related to systems, services, and partnerships are covered.

- *Reviewing Files and Documentation.* Service Reviewers review files of focus children and families, in addition to other documents. When reviewing child files, reviewers pay attention to information on enrollment, screening, health services, disabilities issues, anecdotal notes, ongoing reports of child progress, and child outcomes.
 - Reviews of child files on focus children enable Service Reviewers to get a comprehensive picture of what services to children and families have been documented. When reviewing child files, Service Reviewers may be required to complete the **Income Eligibility Data Collection Form** at the Team Leader's discretion. The Team Leader may assign completion of this checklist to one or more Service Reviewers.
 - Service Reviewers review files on focus families, including information on family partnership development and participation in parent activities.
 - Review of other documentation helps Service Reviewers answer questions related to services and partnerships. This may include, for example, Education Committee minutes, the child outcomes plan, Health Services Advisory minutes, and menus.

During the **focus child and family process**, Service Reviewers look at focus children and their families from the perspective of their specific area of expertise, and they use this process to answer the Core Questions for which they have the lead. At the same time, they have a wider lens—looking at the whole child and family. This means that Service Reviewers engage in activities outside their own area of expertise. For example, Service Reviewers specializing in Family and Community Partnerships can conduct classroom observations or look at children's Individual Education Plans (IEPs). Service Reviewers specializing in Child Development Services review the health file to see if their focus child has received all required screenings and at family files to see how the program has engaged in a partnership with their family. Service Reviewers specializing in Health examine screening and assessment data and assess how the program has individualized services for the focus child. Because individual reviewers may not be experts in all areas, it is vital that all reviewers coordinate their work closely. It is the responsibility of all reviewers to regularly share with each other information they encounter (i.e., through file and document reviews, interviews, and observations) in areas outside their own area of expertise to enable the team to identify patterns. Reviewers should share information with other review team members throughout the day as well as at team meetings.

Collecting Information: Systems Reviewers

During the On-Site Activities phase, Systems Reviewers make use of several interview guides and, for fiscal reviewers, a fiscal checklist from the *PRISM Instrument* to address information on nine Core Questions: Program Governance; Planning; Communication; Record-Keeping and Reporting; Ongoing Monitoring; Self-Assessment; Human Resources; Fiscal Management; and Eligibility, Recruitment, Selection, Enrollment, and Attendance. Specific assignments for Systems Reviewers include:

- Interviewing staff with direct knowledge of operational and administrative systems;
- Reviewing documentation to obtain information related to systems;
- Participating in group interviews. Four interview guides are helpful in understanding the grantee's systems:
 - **Governing Body Interview.** This guide contains questions for members of the grantee governing group and assists in addressing the issues related to how the governing body is involved in the agency's planning process, exercises oversight, and ensures accountability
 - **Policy Council Interview.** This guide also contains questions pertaining to governance and is used with Policy Council members following a regular business meeting of the Policy Council.
 - **Community Partnerships Interview.** As noted previously, it may be appropriate to ask both Systems and Service Reviewers to attend this interview.
 - **Child Care Partnerships Interview.** As noted previously, it may be appropriate to ask both Systems and Service Reviewers to attend this interview.
- Completing assigned questions in the **Transportation Services Checklist** regardless of whether the program provides transportation services to children;
- Completing the **Income Eligibility Data Collection Form**, at the Team Leader's discretion. The Team Leader might otherwise assign completion of this checklist to one or more Systems Reviewers;
- Verifying service-to-system and system-to-system interrelationships, as appropriate; and
- Completing the **Fiscal Checklist**. In FY 2005, the Bureau adopted a "risk-based" approach to fiscal monitoring, consistent with the risk-based framework adopted by the Government Accountability Office (GAO) and the Committee of Sponsoring Organizations of the Treadway Commission (COSO).⁸ Under the risk-based approach, the objective of fiscal monitoring includes not only an assessment of compliance with applicable program requirements, but also a review of a set of prioritized indicators (i.e., "red flags") designed to identify underlying fiscal problems early. These indicators focus first on those areas that, if irregularities were present, would likely have the greatest adverse impact on the fiscal health of the grantee. The FY 2006 Fiscal Checklist maintains the risk-based approach. The checklist is divided into five sections organized by their focus: (1) Fiscal Risk Indicators; (2) Internal Controls and Monitoring; (3) Fiscal Accountability; (4) Reporting; and (5) Summary Standards.

⁸ General Accounting Office, *Standards for Internal Control in the Federal Government*, November 1999 (GAO/AIMD-00-21.3.1); Committee of Sponsoring Organizations of the Treadway Commission, *Internal Control -- Integrated Framework* (July 1994); and Committee of Sponsoring Organizations of the Treadway Commission *"Enterprise Risk Management - Integrated Framework"* (September 2004).

VERIFICATION OF INFORMATION

As review team members gather information from multiple sources during the On-Site Activities phase of the review, they must also verify its accuracy. Accurate information is crucial to making sound monitoring review determinations. All information relied on to make final monitoring decisions must have sufficient evidentiary support in order to be legally defensible. In collecting information, reviewers should follow these principles:

- **Collect information from multiple sources** (i.e., whenever possible, the reviewer should seek to obtain additional information that might corroborate or contradict the content of the information already gathered);
- **Rely on the best evidence available** (e.g., firsthand information is preferred over secondhand information); and
- **Evaluate contradictory information** (e.g., give less weight to uncorroborated testimony than to corroborative written evidence from multiple sources).

In obtaining information from as many sources as possible, reviewers should consult both with the grantee and with each other, as described below.

Consulting With the Grantee

When and if a reviewer identifies a gap in information, the reviewer should consult immediately with the appropriate grantee staff, identifying the specific information sought and the information collected thus far. This consultation provides the grantee an opportunity either to supply the needed information or to explain its absence.

Collaborating With Review Team Members

Reviewers who have identified preliminary findings that may relate to other services or systems should immediately consult with other reviewers to ensure that relevant services or systems are assessed and evaluated concerning interrelationships. By alerting other reviewers immediately to concerns, reviewers who are best-positioned to gather relevant information have the opportunity to do so as soon as possible. Early efforts to verify critical information during the day also ensure multiple opportunities to exchange information during team meetings and to identify additional approaches to gathering and verifying data.

USING THE FY 2006 PRISM SOFTWARE TO RECORD EVIDENCE

All reviewers are encouraged to use the software to log information collected each day, and are required to electronically record all evidence used as support documentation for any recommended preliminary areas of noncompliance. The review team uses the software to memorialize all preliminary areas of noncompliance and associated evidentiary support. The FY 2006 PRISM Software User Manual provides detailed guidance on using the software; this section provides an introduction to the software's functional capabilities as they relate to the on-site phase of the review.

Electronic Record of Review Activities

For logging daily data-gathering activities, reviewers can access PRISM instruments in the FY PRISM Software. Specifically, the software includes the following:

Core Questions

Protocols

- Health Protocol
- Nutrition Protocol
- Disabilities Protocol
- Mental Health Protocol (to be released during the first quarter of FY 2006)
- Early Childhood Development Protocol (to be released during the first quarter of FY 2006)

Interview Guides

- Family Group Interview Guide
- Child Care Partnerships Interview Guide
- Community Partnerships Interview Guide
- Policy Council Interview Guide
- Governing Body Interview Guide

Checklists/Observations Instruments

- Health and Safety Checklist
- Fiscal Checklist
- Transportation Services Checklist
- Classroom, Family Child Care, or Socialization Experience Observation Instrument
- Home Visit Observation Instrument
- Income Eligibility Process and Data Collection Form Instructions
- Income Eligibility Data Collection Form

Reviewers can, for example, complete the Health and Safety Checklist or the Fiscal Checklist electronically. Review team members can record “notes” from all observations, interviews, document reviews and other data-gathering activities electronically in the PRISM software. Every team member’s notes are maintained as separate sources of information in the software; each team member’s name appears with notes he or she records. Observations can be recorded as “issues,” which are areas of concern being investigated by the team. Creating an “issue” enables the reviewer to identify and track issues for which additional clarification or further evidence is needed. If sufficient evidence has been documented and, specifically (1) a standard is selected,

and (2) the program type (i.e., Head Start, Early Head Start, or Head Start/Early Head Start) is selected, the status of the “issue” can be changed to “preliminary area of noncompliance.” The status of an issue cannot be changed from “investigating” to “preliminary area of noncompliance” without completing the aforementioned steps. The narrative for the preliminary area of noncompliance is prepared directly in the PRISM software.

Of note, information entered into protocols, interview guides, checklists, or other forms is linked to Core Questions by the *Refer to*, *Interview*, and *Review* references associated with each Core Question. For example, the Transportation Checklist is referenced in Core Questions 9A (Prevention) and 12 (Disabilities Services), among other Core Questions. In the software, all checkmarks and notes recorded in the Transportation Checklist will appear under both Core Questions 9A and 12 (as well as any other Core Questions that reference this checklist). Summary reports are available for each Core Question. These reports present all “notes” and all “issues” pertaining to a given Core Question.

Communication and Collaboration Among Review Team Members

The ability to share electronic information on a regular and ongoing basis provides the team and HHS officials with an increased capacity for regular communication and collaboration, but is not intended to substitute for on-going personal communication. Synchronizing computers allows for a wealth of information sharing over the course of the week. Reviewers readily can share information with the Report Coordinator and Team Leader, who can monitor issues to determine whether additional evidence is needed before considering the issue to be a preliminary noncompliance. Reviewers can synchronize computers with one another as well. Synchronization enables the transfer of information from one computer to another. Information is shared and organized within the software to allow all team members to view all “notes” and “issues” pertaining to each Core Question, while the software maintains a historical account of all entries made by each individual team member.

The synchronization function provides the Report Coordinator with an electronic record of all issues and preliminary areas of noncompliance for each core question. Team members should be requested to synchronize their computers with the Report Coordinator at predetermined times (e.g., at the start and/or end of each team meeting).

Using the PRISM Software, the Team Leader and Report Coordinator can track which reviewer is assigned responsibility for a particular “issue,” or if sufficient evidence exists, for a preliminary area of noncompliance. Team members may transfer responsibility (or, “assign” in the software’s terminology) by selecting the appropriate option (assigning a task), then synchronizing their computer with that of the person to whom the assignment was made.

Writing up Preliminary Areas of Noncompliance

The written preliminary areas of noncompliance are the work product of the on-site phase of the review. This information is maintained in the PRISM software, and can be viewed in a preliminary review report. Every review team must record in the PRISM software all preliminary areas of noncompliance, with sufficient evidentiary support and a clear, thorough and accurate write up of each noncompliance. As indicated previously, the software tracks all “issues” from their inception through the decision to either close the issue (e.g., based on either insufficient evidence or evidence that suggests that what was initially perceived as a potential problem, after further investigation, was not a problem), or write the issue up as a preliminary area of noncompliance.

REVIEW TEAM MEETINGS

Team meetings, which usually occur at the end of each day while on-site, are a critical component of the On-Site Activities phase. Typically, team members participate in five team meetings while on-site, with the first meeting occurring on Sunday evening and the fifth meeting occurring on Thursday. Some reviews may extend beyond a one-week period, particularly for grantees with multiple delegates being reviewed.

Overall, the team meetings provide review members with opportunities such as:

- Sharing information about the grantee's systems, services, and partnerships;
- Clarifying each reviewer's understanding of relevant facts, as established by the information (i.e., evidence) gathered, that will form the basis for decisions regarding compliance;
- Recording in the PRISM software all evidence collected during the day's activities, and synchronizing reviewers' computers with the Report Coordinator and other reviewers to share electronic copies of evidence collected and issues identified each day;
- Discussing issues identified during the day, and monitoring issues identified over the course of the review to determine whether sufficient evidence exists to consider the issue a preliminary area of noncompliance;
- Discussing potential interrelationships among issues identified within service and systems Core Questions, including relationships between (a) services and systems, and (b) systems and other systems, if applicable;
- Planning for the subsequent day's activities, which may be assisted by using the Team Assignment Worksheet located in the Forms Appendix;
- Providing the Team Leader with the information needed so he or she can make preliminary compliance decisions, and using the Summary of Review Decisions Worksheet located in the Forms Appendix to track daily discussions and follow-up activities regarding these decisions; and
- Writing all preliminary areas of noncompliance clearly and thoroughly.

Expectations of Reviewers at Team Meetings

All Head Start program reviewers are expected to conduct themselves as professionals and to make ongoing and tangible contributions to the preliminary review report. To ensure that team meetings are conducted efficiently, reviewers must come to the meetings prepared. For example, reviewers are encouraged to organize and summarize their notes prior to the nightly meetings. This includes reviewing protocols and any observation instruments used (e.g., the Health and Safety Checklist). When reviewers have worked in pairs or small groups (e.g., to conduct a Governing Body Interview), they should compare and reconcile their notes and recollections prior to team meetings. Such interaction outside of team meetings is critical to ensure efficient use of time in the team meetings.

During the meeting, reviewers are expected to summarize their results and recommend preliminary decisions regarding compliance. (The Team Leader is responsible for signing off on preliminary compliance decisions; decisions are finalized at either the Head Start Bureau or the Regional Office.) Some guidelines for this process follow:

- Reviewers must ground their judgments in fact, based on what they or other reviewers observed, heard, or read;
- Reviewers must identify the program requirement(s) associated with each preliminary area of noncompliance;
- The individual with the lead for each Core Question begins the discussion by summarizing the day's activities and any issues that have arisen during the day;
- All other team members may provide input about a system, service, partnership, or the connections among the three;
- All team members may identify potential interrelationships between service areas and system areas, and system areas to each other; and
- The Report Coordinator should require that reviewers synchronize their computers with the Report Coordinator at specified points in time (e.g., at start and/or end of each team meeting).

Purpose of Each Team Meeting

The purpose of the first team meeting—usually conducted the Sunday evening prior to the team's Monday arrival at the grantee site—is to review planned activities and to ensure that all team members understand their respective roles and responsibilities and the team's common objectives. During the meeting conducted at the end of the second day on-site (i.e., Monday), reviewers process and analyze information gathered during the Entrance Meeting and other activities, including observations, interviews, and reviews of documents, and they begin developing a common understanding of the grantee's systems, services, and partnerships.

During the meetings conducted at the end of the third and fourth days on-site, the review team continues to process and analyze the data gathered through the PRISM review activities, including the focus child and family process. Such activities include document and file reviews,

observations of center- and home-based activities, interviews, and completion of related checklists. During these meetings, reviewers share information, seek clarification, determine if assistance is needed, and they begin to conceptualize their recommendations for decisions regarding compliance and interrelationships of services to systems and/or systems to systems.

The final team meeting conducted on the last full day on-site (i.e., Thursday) is dedicated to final analysis of the facts, followed by preliminary decisions from the Team Leader regarding grantee compliance and completion of the draft Head Start Review Report. While the summary meeting will no longer occur, at the discretion of the Team Leader review team members, including Team Leaders and Report Coordinators, may finish writing and recording the preliminary areas of noncompliance in the PRISM Software on Friday.

Additional communication and coordination during reviews of grantees with delegates. If a review has multiple teams (i.e., "subteams") monitoring a variety of delegate agencies simultaneously, the Team Leader also must communicate and coordinate with the subteam leaders. Such practices ensure that each subteam can follow up on issues raised by other subteam(s). For example, if one subteam finds a lack of ongoing monitoring of one delegate agency's health services on the part of the grantee, the Team Leader can ask all other subteams to check on this issue in their delegate agencies and also consider whether there is an issue with the grantee's oversight of the delegate.

The FY 2006 PRISM Software's design facilitates the Team Leader's ability to collaborate with subteam leaders. The Report Coordinator of the grantee review should synchronize computers with subteam Report Coordinators. This synchronization shares information between the two Report Coordinators, providing the grantee Report Coordinator with a comprehensive list of issues identified in the reviews of the grantee and delegate agencies. The grantee review Team Leader is responsible for identifying systemic issues that pertain to multiple delegates.

ONGOING DIALOGUE

There should be ongoing dialogue among reviewers, grantee staff, and parents throughout the course of the on-site review. This ongoing communication facilitates clarification of facts and full understanding of grantee operations.

MAKING AND DOCUMENTING PRELIMINARY REVIEW DECISIONS

At the end of the data collection, verification, and analysis process, the Team Leader decides whether the issues identified by the team are considered preliminary areas of noncompliance. As indicated previously, the written preliminary areas of noncompliance are the work product of the on-site phase of the review. The Team Leader's recommendations for preliminary areas of noncompliance can be printed from the PRISM software by Core Question in a summary report.

In writing up preliminary areas of noncompliance, reviewers, Report Coordinators, and Team Leaders must ensure that:

- The structure of the preliminary area of noncompliance presents the problems and supporting evidence in a logical manner, without ambiguity of meaning or confusion of terminology;

- The topic sentence of each preliminary area of noncompliance uses language of the standard that is tailored to the aspects of the requirements that are found out of compliance;
- The evidence described in each preliminary area of noncompliance matches and relates to the specific requirements in the standard being cited;
- All assertions of fact are supported by specific evidence that is sufficient to justify making the assertion;
- All persons interviewed are identified by title or location of assignment; locations of all observations are specified; and all documents are specifically identified in the narrative text;
- Interviews are used *both* to gather information and expand on facts, as well as to confirm evidence already collected; and
- The narrative text is clear and free of grammatical, tense and other typographical errors.

Writing Preliminary Areas of Noncompliance

When a program is not meeting a program requirement, the reviewer must write a description of the issue and, when sufficient evidentiary support exists, indicate the issue to be a preliminary area of noncompliance. (In the FY 2006 PRISM Software, this entails changing the status of the “issue” from “investigating,” to “preliminary area of noncompliance.” A detailed explanation is provided in the PRISM 2006 Software user manual.)

When documenting a preliminary area of noncompliance, a review team member must:

1. Cite the appropriate program requirement. The FY 2006 PRISM Software requires an individual to select a specific program requirement, and provides a drop-down menu for the individual to identify the relevant citation (e.g., 1306.32(a)(3)) and the full text of the requirement. When citing standards, reviewers have the option to select from a list of standards related to a specific core question, as well as to select a standard from a list of any remaining program requirements (i.e., any standard that is not related specifically to the core question).
2. Generate narrative description of each finding:
 - a. Through the topic sentence, briefly describe how the grantee is out of compliance with the identified program requirement. A topic sentence:
 - Is the first sentence in the preliminary area of noncompliance;
 - Introduces the preliminary area of noncompliance; and
 - Addresses the specific requirements in the preliminary area of noncompliance that are going to be addressed by the supporting evidence, that is, the scope of the topic sentence is tailored to fit the scope of the evidence on the requirement that is

out of compliance.

b. Describe the evidence on which the team relied to identify the noncompliance:

- Include specific examples. Multiple examples should be provided whenever possible, and numbers used to quantify and demonstrate the size or pervasiveness of the problem.
- Describe the methodologies used to gather data from the sources.
 - A method is a procedure or process for attaining information, and a mode of inquiry.
 - Types of methodologies include interviews, observations, and document review.
 - Include multiple methods.

c. Describe the sources the team relied on in identifying the preliminary area of noncompliance.

- A source is a point of origin or procurement that supplies information.
- Types of sources include people, settings, and documents.
- Include multiple sources.

3. When documenting a preliminary area of noncompliance that pertains to a specific *delegate* agency, the first line of the narrative should be the delegate's full name, listed alone on this line. The topic sentence then follows this line of text. Entering the delegate name on the first line of the text of the narrative ensures that the preliminary area of noncompliance documented in the review report clearly indicates the delegate(s) in which specific problems were identified, which provides more focused feedback to grantees.

4. If the grantee is meeting some but not all components of a given requirement, the narrative should only address those components for which the grantee is out of compliance. The purpose of the documentation is to report on the problem areas identified (i.e., "exceptions" to compliance).

5. Team members are encouraged to collaborate to identify interrelationships between preliminary areas of noncompliance identified for different service and/or systems requirements. Daily communication among team members, including during the team meetings, should emphasize identification of potentially interrelated areas. Potential interrelationships may take various forms, including:

- A single issue occurring multiple times in a single service area. For example, a Health Reviewer who observes multiple safety violations within several playgrounds should raise the issue at the team meetings to cue the systems reviewer of a potential ongoing

monitoring problem that should be pursued by the Program Design and Management Reviewer with appropriate grantee staff.

- A single issue occurring once, but across multiple services. For example, a Health Reviewer, a Mental Health Reviewer and a Disabilities Reviewer all may observe a potential problem with the grantee's record keeping policies and procedures. While the issue should be cited within each service area, it is critical that the team's collaborative processes identify this issue as a systems-level problem.

When interrelationships are identified, the service reviewer is responsible for citing the identified service program requirement as a preliminary area of noncompliance. The systems reviewer is responsible for describing the relationship between the systems issue and the service issue within the body of the preliminary area of noncompliance narrative pertaining to the systems requirement. That is, the interrelated preliminary areas of noncompliance will appear within the corresponding *systems* Core Question. To document interrelated areas of noncompliance, the systems reviewer completes the following tasks:

- When determining that a systems issue is a preliminary area of noncompliance, the systems reviewer should indicate when the identified preliminary area of noncompliance is interrelated to another core question(s). (This is done by checking a box, and selecting the core questions to which the preliminary area of noncompliance is related. This process is detailed in the PRISM 2006 Software user manual.)
- The systems reviewer selects all related citations. It is possible for interrelated areas of noncompliance to include more than two citations. For purposes of this discussion, we will assume that only two citations—one in a service area and one in a systems area—are implicated. Accordingly, the systems reviewer would select from the drop-down menu of program requirements the references to the relevant citations (e.g., 1304.51(i)(2) and 1304.21(c)(1)(i)).
- When generating the preliminary area of noncompliance narrative describing an interrelated finding, the topic sentence describes how the management system failed to effectively fulfill its function in relationship to another service or system area. Using the example cited above, in the case of a program that has multiple health and safety violations on several playgrounds, the systems reviewer might, if supported by sufficient evidence, report that the grantee's ongoing monitoring did not routinely include safety inspections for all Head Start playgrounds. The topic sentence links explicitly and directly to both the systems core question and the interrelated service core question regulations that are both being cited. The narrative text should present sufficient evidence to support the conclusion that the service delivery problem(s) could have been identified and/or corrected by the management system if it had performed its function effectively.
- When generating the preliminary area of noncompliance narrative describing an interrelated finding, the systems reviewer should cross reference the citation(s) identified by the service reviewer, but should not replicate either the service reviewer's narrative or citation in full within the body of the interrelated preliminary area of noncompliance

narrative. Rather, when citing interrelated citations, the standard that has already been cited in either a service area or another systems area should be summarized to highlight the information that is relevant to the interrelated systems area.

If during the On-Site phase of a monitoring review the grantee corrects a preliminary area of noncompliance before the conclusion of the on-site review, the noncompliance still must be recorded in the PRISM Software as a preliminary area of noncompliance. The review team is expected to generate narrative for preliminary area(s) of noncompliance corrected in the field as described above. Such citations, however, should be marked as corrected in the field. This is done by selecting the appropriate status for this issue—“preliminary area of noncompliance corrected in the field.”

DOCUMENTATION OF REVIEW ACTIVITIES

As reviewers collect information during the On-Site Activities phase of the review, they must take comprehensive notes—preferably electronically on the various protocols, interview guides, observation forms, and checklists—or in writing on these forms or on their own notebook paper. These are preliminary and predecisional. On the last day of the On-Site Activities phase of the review, reviewers are required to initial and date each page of their handwritten notes and turn these in to the Team Leader. Similarly, all protocols, checklists, observation forms, and interview guides that include comments written during the On-Site Activities phase of the review must be initialed and dated and given to the Team Leader. This serves as record of data-collection activities. Given the important nature of these notes, reviewers must be diligent in their note-taking during the On-Site Activities phase of the review, documenting relevant details of all review activities in which they participated, including identifying who they interviewed, what they observed, and what files they reviewed.

Reviewers, Team Leaders, and Report Coordinators each have roles to play to ensure that on-site review documentation is appropriately preserved. These roles are as follows:

1. Reviewers

- Document each day’s review activities including all evidence acquired from the grantee or delegate;
- Compile the week’s documentation into one package of material by the end of the last full day of the review week;
- Create a face sheet for the documentation that functions as an index or table of contents; and
- Turn in to the Team Leader the week’s documentation package.

2. Team Leaders

- Ensure that each reviewer is keeping daily documentation of review activities including evidence acquired from the grantee; and

- Collect documentation at the end of the week for each reviewer.
- Note that after the Head Start Review Report is issued to the grantee, the Federal Team Leader is responsible for mailing all materials related to the review (i.e., all completed forms and other evidence) to the Regional Office of the grantee that was monitored. The records are maintained at the Regional Office with ongoing responsibility for the grantee.

3. Report Coordinators

- Verify that each reviewer has turned in a package of material documenting their review week activities; and
- Are responsible for collecting, organizing, indexing and mailing the completed forms and other evidence from the review to the Federal Team Leader's Regional Office.

CLOSING OUT THE REVIEW

Team members must complete various actions in the PRISM software at the end of the review. Specific actions are described below.

- After completing all work on the review, each reviewer must synchronize his or her computer with the Report Coordinator. During this synchronization, the reviewer must indicate that he or she has completed the review (by marking the appropriate check box – this process is detailed in the software's user manual). All review team members using a computer must "complete" the review within the PRISM Software, which ensures that the Report Coordinator has all needed information, and deletes the review information from the individual reviewer's computer.
- The Report Coordinator and Team Leader must confirm the quality of the preliminary areas of noncompliance recorded in the software. Specifically, the Report Coordinator and Team Leader will confirm that:
 - Each finding matches its citation;
 - Each finding is clearly described; and
 - Each finding is supported by sufficient evidence.
- The Team Leader must confirm that the PRISM process was implemented in accordance with the FY 2006 *PRISM Guide*.

Grantee Notice: The Head Start Review Report

After completion of the On-Site Activities phase, the PRISM review enters the Grantee Notice Phase. This phase encompasses finalizing compliance decisions, generating the Head Start Review Report, and sending the review report to grantees as legal notice of the results of the PRISM review.

FINALIZING REVIEW DECISIONS

The Head Start Review Report notifies the grantee of all final decisions regarding identification of any areas of noncompliance, including those that meet the definition of deficiency, and any requirements for corrective action, as applicable. Authority to finalize these decisions resides with the HHS official or designee issuing the review report.

Deficiencies. The Head Start Act authorizes HHS officials to determine, on the basis of a review, that a grantee has one or more deficiencies and require that grantees to be notified of such determinations.

Section 641A (d)(1) states—

If the Secretary determines, on the basis of a review pursuant to subsection (c), that a Head Start agency designated pursuant to section 641 fails to meet the standards described in subsection (a) or results-based performance measures developed by the Secretary under subsection (b), the Secretary shall—

(A) inform the agency of the deficiencies that shall be corrected;

HHS officials are guided by the Head Start regulations in making final compliance decisions. Such decisions will be made only when sufficient evidence exists to satisfy the regulatory definition of deficiency. The Performance Standards, at 45 CFR 1304.3 (a)(6), define a deficiency as follows:

(i) An area or areas of performance in which an Early Head Start or Head Start grantee agency is not in compliance with State or Federal requirements, including but not limited to, the Head Start Act or one or more of the regulations under parts 1301, 1304, 1305, 1306, or 1308 of this title, and which involves:

(A) A threat to the health, safety, or civil rights of children or staff;

(B) A denial to parents of the exercise of their full roles and responsibilities related to program governance;

(C) A failure to perform substantially the requirements related to Early Childhood Development and Health Services, Family and Community Partnerships, or Program Design and

Management; or

(D) The misuse of Head Start grant funds.

(ii) The loss of legal status or financial viability, as defined in part 1302 of this title, loss of permits, debarment from receiving Federal grants or contracts or the improper use of Federal funds; or

(iii) Any other violation of Federal or State requirements including, but not limited to, the Head Start Act or one or more of the regulations under parts 1301, 1304, 1305, 1306 or 1308 of this title, and which the grantee has shown an unwillingness or inability to correct within the period specified by the responsible HHS official, of which the responsible HHS official has given the grantee written notice of pursuant to section 1304.61.

Areas of Noncompliance. The Performance Standards, at 45 CFR 1304.61 (a), authorize HHS officials to determine, on the basis of a review, that grantees have areas of noncompliance which do not constitute deficiencies, but which must, nonetheless, be corrected.

If the responsible HHS official, as a result of information obtained from a review of an Early Head Start or Head Start grantee, determines that the grantee is not in compliance with Federal or State requirements (including, but not limited to, the Head Start Act or one or more of the regulations under parts 1301, 1304, 1305, 1306 or 1308 of this title) in ways that do not constitute a deficiency, he or she will notify the grantee promptly, in writing, of the finding, identifying the area or areas of noncompliance to be corrected and specifying the period in which they must be corrected.

GENERATING THE HEAD START REVIEW REPORT

HHS officials must ensure the Head Start Review Report is generated as soon as possible after the final compliance decisions have been made. A preliminary Head Start Review Report is generated directly within the FY 2006 PRISM software, based on the preliminary areas of noncompliance recorded by the team during the on-site phase of the review. The Head Start Review Report has been reformatted for FY 2006 to ensure national consistency.

The Head Start Review Report will contain the following elements:

- Specification of the official recipient of the document and individuals receiving hard copies of the report;
- Overview information such as the type of review, review dates, funded and actual enrollment, type of organization, and type of program (Head Start, Early Head Start, or combined Head Start and Early Head Start);
- Determinations (i.e., deficiency(ies), area(s) of noncompliance not related to a deficiency, or compliance with all program requirements), including the citation(s) for the specific performance standard(s) or program requirement(s), if any, for which the grantee was determined to be noncompliant or deficient; and

- The narrative, citation(s) and corrective action timeframe(s) associated with each determination.

GRANTEE NOTICE

The Head Start Review Report must be mailed to the grantee governing body president as soon as possible after final determination decisions are made. On the same day these documents are mailed to the grantee, a copy of the report must be mailed to:

- The Policy Council Chairperson;
- The Executive Director;
- The Head Start Director;
- The ACF Regional Administrator;
- Paul Blatt, Monitoring Lead, Head Start Bureau at 1250 Maryland Avenue, SW, Washington, DC 20024; and
- Head Start Monitoring Reports, Danya, International at Head Start Monitoring Reports, 8737 Colesville Road, Suite 1100, Silver Spring, MD 20910.

Review team members may request a copy of the Head Start Review Report for any reviews on which they participated by submitting such a request to headstartreviews@danya.com.

The HHS official or designee issuing the report must verify that the report is received by the grantee using the least costly mechanism to confirm receipt (e.g., return receipt on regular mail). The HHS official or designee responsible for confirming receipt of the report must record the confirmed date of receipt in the PRISM software.

For grantees with no determinations of deficiency and no areas of noncompliance, the Grantee Notice phase of the review concludes with the delivery of the Head Start Review Report, and there is no Program Improvement and Corrective Action phase. For grantees with final compliance decisions that identify one or more deficiency determinations, or include one or more areas of noncompliance, the Program Improvement and Corrective Action Phase begins, as described in the following chapter.

Program Improvement and Corrective Action

Program improvement and corrective action activities are designed to strengthen Head Start grantee programs by ensuring full compliance with all Head Start requirements. These activities include engaging the technical assistance (T/TA) system to ensure that grantees have the support needed to facilitate improvement, reviewing and approving the Quality Improvement Plan (QIP), and monitoring resolution of each noncompliance or deficiency, as applicable. With the aid of the PRISM software, each area of noncompliance and each deficiency will be tracked from its initial identification to its final resolution. (i.e., correction or adverse action).

All areas of noncompliance and deficiencies must be corrected within the prescribed timeframe for correction as specified in the Head Start Review Report. Any area of noncompliance that was not initially identified as a deficiency, but which remains uncorrected within the timeframe specified by the HHS official or designee, will be determined to be a deficiency. As required by section 641A(d)(1)(C) of the Head Start Act, if a grantee fails to correct a deficiency, the HHS official or designee will “initiate proceedings to terminate the designation of the agency.”

GRANTEES WITH AREAS OF NONCOMPLIANCE

The HHS official or designee must ensure that all areas of noncompliance are corrected within the specified period. In ensuring that areas of noncompliance have been corrected fully and in a timely fashion, section 641A(c)(1)(C) of the Head Start Act requires the HHS official or designee to conduct one or more follow-up visits. A grantee that is unable or unwilling to correct the specified areas of noncompliance within the prescribed time period will be determined to have a deficiency that must be corrected within the timeframe specified.

In some limited circumstances, the HHS official or designee may accept a letter certifying that specified areas of noncompliance have been corrected (i.e., provided that such certification is accompanied by sufficient documentary evidence supporting the claim of full correction and indicating the date(s) of such correction). In such cases, the HHS official or designee should issue a letter to inform the grantee that the certification letter was accepted as evidence that the specified program requirements are no longer out of compliance. The HHS official or designee needs to document correction of the noncompliance in the software, as well as attach to the grantee’s record electronic copies of both the grantee’s original certification letter and the HHS official or designee’s confirmatory letter.

GRANTEES WITH DEFICIENCIES – QUALITY IMPROVEMENT PLANS (QIPs)

The Head Start Act requires HHS to make training and technical assistance available to grantees “with respect to the development or implementation of such quality improvement plans to the extent the Secretary finds such provision to be feasible and appropriate given available funding and other statutory responsibilities.” (See section 641A (d)(3))

The requirements for developing a QIP are specified in the Head Start Act as follows:

*An Early Head Start or Head Start grantee with one or more deficiencies to be corrected under a Quality Improvement Plan must submit to the responsible HHS official a Quality Improvement Plan specifying, for each identified deficiency, the actions that the grantee will take to correct the deficiency and the timeframe within which it will be corrected. In no case can the timeframes proposed in the Quality Improvement Plan exceed 1 year from the date that the grantee received official notification of the deficiencies to be corrected.*⁹

To expedite the development of the QIP, the HHS official or designee may ask the grantee to provide drafts so the official can provide immediate feedback. The Head Start Act requires the HHS official or designee to notify the grantee, in writing, of the Plan's approval or specify the reasons why the Plan is disapproved. (See section 641A (d)(2)(B)) For disapproved plans, the grantee must revise and resubmit the QIP. Resubmission requirements are specified in the Performance Standards as follows:

*If the Quality Improvement Plan is disapproved, the Early Head Start or Head Start grantee must submit a revised Quality Improvement Plan, making the changes necessary to address the reasons that the initial Plan was disapproved.*¹⁰

FOLLOW-UP REVIEWS

If a grantee fails to meet applicable program requirements after a full triennial, first-year, or other Head Start review has been conducted, a follow-up review may be initiated and scheduled by the HHS official or designee. An on-site follow-up monitoring review will be conducted for all grantees that are determined to have deficiencies, and for many grantees that are determined to have an area(s) of noncompliance.

At the conclusion of the follow-up visit, the follow-up review team makes a preliminary determination as to whether an area of noncompliance or a deficiency has been corrected. During the conduct of the follow-up visit, the Team Leader should direct review team members to gather and record in the PRISM software sufficient evidence (e.g., through document and file reviews, interviews with grantee management and staff, and observation of operations) to determine whether the area of noncompliance or deficiency has been corrected. It is critical that the team provides—and documents in the PRISM Software—sufficient evidence to support the determination that a correction was made.

Final determination regarding the status of an area(s) of noncompliance or a deficiency(ies) is made by the HHS official or designee. In cases where grantees are judged to have corrected all areas of noncompliance and deficiencies, the Grantee Notice and Program Improvement phase ends.

The following guidance should be considered for grantees with deficiencies:

- Immediately after a QIP is approved the HHS official or designee must ensure the follow-up review is scheduled within a few days from the end of the QIP period. If a grantee has

⁹ 42 USC 9836(d)(2)(A).

¹⁰ 45 CFR 1304.60(e).

more than one deficiency, and the deficiencies have different end dates, the Team Leader may organize multiple follow-up visits.

- It is important to keep in mind that, while a grantee may have implemented all actions specified in a QIP, the deficiency is corrected only if the grantee can demonstrate full compliance with all requirements specified as deficient in the Head Start Review Report. (See First State, DAB No. 1877 (2003))¹¹
- As indicated previously, the Performance Standards specify that for grantees with deficiencies judged to persist beyond the specified period, the responsible HHS official or designee must terminate the grant or deny refunding.¹²

USING THE FY 2006 PRISM SOFTWARE TO TRACK ACTIVITIES

The FY 2006 PRISM Software is designed to assist in tracking areas of noncompliance and deficiencies from their initial determination through their final outcomes. HHS officials or designees use the PRISM software to track corrective action and program improvement activities for grantees with areas of noncompliance and/or deficiency(ies). As described in the previous chapters, the on-site review team documents each preliminary area of noncompliance in the software with narrative text containing supporting evidence, applicable standards and requirements, and indication of whether the finding of noncompliance is applicable to a Head Start, Early Head Start, or combined Head Start/Early Head Start program. Compliance decisions are finalized by the HHS official or designee issuing the Review Report. The Head Start Review Report is generated and sent to the grantee by the HHS official as official notice. The certification of receipt that the grantee has received the review report initiates follow-up activity within the PRISM software system. Specifically, the software creates the follow-up task as soon as the return receipt is entered in the system, with the due date of the task based on the timeframe for corrective action specified in the Head Start Review Report.

Using the PRISM Software, a follow-up review report is generated for each follow-up review conducted. When a Regional Office determines that an on-site follow-up visit is required, the designated Team Leader must contact Danya to schedule the review, regardless of the number of team members needed for the review. Even if the Team Leader chooses to conduct the review alone, Danya must be contacted because Danya's database creates the follow-up review record in the PRISM Software.

When an on-site follow-up review is scheduled, the information recorded in the fiscal year 2006 triennial or first-year review for the grantee pre-populates the follow-up report as grantee history. This information is available to the follow-up review team for tracking areas of noncompliance and/or deficiency(ies). All current areas of noncompliance are included in each follow-up review. During the on-site follow-up review, the Team Leader and review team members can mark each individual area of noncompliance or a group of areas of noncompliance that constitute a deficiency as "corrected," "not corrected," or "not reviewed." All "open" determinations, or,

¹¹ In the First State decision, the HHS Departmental Appeals Board held "the point that ACF was making (and had made in approving the QIP) is that the grantee has the responsibility, if the steps set out in the QIP are not correcting the deficiency, to take other steps necessary to do so. In other words, the grantee has an ongoing responsibility for monitoring whether it is complying with the applicable requirements and for doing what is necessary to comply."

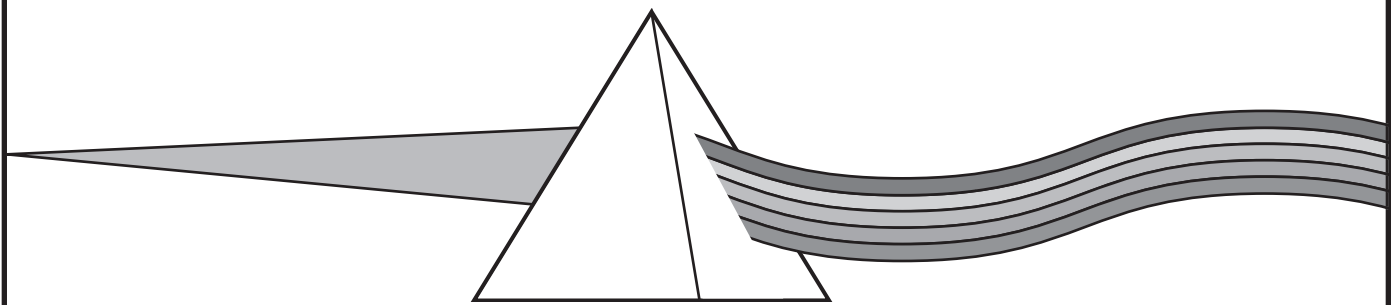
¹² 45 CFR 1304.60(f)

those that were neither corrected nor reviewed during the on-site follow-up visit, are documented in the follow-up review report, and will continue to be documented in any subsequent reports until they are corrected or otherwise closed. Accordingly, the report will continue to provide the grantee with the history related to each determination until that determination is resolved, or closed. Note that in addition to reviewing areas of noncompliance and deficiencies identified on a previous review(s), the follow-up review team records in the PRISM Software any newly identified areas of noncompliance (i.e. identified on the follow-up review).

To facilitate use of the PRISM 2006 Software for documenting corrective action activities on reviews conducted in fiscal year 2005, The Lewin Group will manually record historical information on areas of noncompliance and deficiencies into the FY 2006 PRISM Software based on the hard copy review reports issued to grantees.

PRISM

*Program Review Instrument for Systems Monitoring
of Head Start and Early Head Start Grantees*



All Instruments
2006



PRISM Instrument

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Core Questions

These 18 Core Questions guide reviewers through the Head Start Program Review Instrument for Systems Monitoring (PRISM) review process. Each reviewer has responsibility for providing input on these Core Questions. Review decisions for each question are made through team discussion, with the final decision by the team leader. Reviewers need to rely on their own information and information collected by others.

There is a page devoted to each Core Question. The Core Question is at the top of each page, and to the right of the Core Question are the specific citations—the Performance Standards and other regulations—included in, or represented by that Core Question. Beneath

the Core Question are several bulleted items. The bullets at the bottom of each page suggest data collection methods for that particular Core Question.

- First, they ask reviewers to refer to pertinent information gathered during various parts of the review;
- Next, they tell reviewers what to observe;
- Third, they tell reviewers which Head Start staff, parents, and community members may need to be interviewed; and
- Finally, they indicate which documents and materials are pertinent for the review.

Reviewers can take notes on the page facing

each Core Question. The notes should be clear, since they will be submitted to the team leader at the end of the review

WHAT'S NEW IN 2006?

A Mental Health Core Question (#11) has been added, and the Child Outcomes Core Question has been eliminated. The Fiscal Management (CQ8) and Disabilities Services (CQ12) Core Questions have been revised to align with the FY 2006 Fiscal Checklist and Disabilities Services Protocol, respectively. Core Questions 9A and 9B have been renamed to Prevention and Early Intervention for Health and Nutrition (9A) and Managing Health and Nutrition Services (9B). Several Core Questions have been renumbered (e.g., the Disabilities Services Core Question is now #12, the Curriculum and Assessment Core Question is now #13, etc.)

PRISM Framework

EFFECTIVENESS OF SYSTEMS	IMPLEMENTATION OF SERVICES AND PARTNERSHIPS									
	Child Development and Health Services				Family and Community Partnerships			Program Design		
	Prevention & Early Intervention	Individu- alization	Mental Health	Disabilities Services	Curriculum and Assessment	Family Partnership Building	Parent Involvement	Community Partnerships	Facilities, Materials, Equipment, and Transportation	
Program Governance										
Planning										
Communication										
Record-Keeping & Reporting										
Ongoing Monitoring										
Self-Assessment										
Human Resources										
Fiscal Management										
Eligibility, Recruitment, Selection, Enrollment, and Attendance										

QUESTION 1. PROGRAM GOVERNANCE

STANDARDS

1304.50, including
Appendix A—Governance and
Management Responsibilities;
1304.52 (k)

How effective is the grantee's system of shared governance in supporting the implementation of quality services to children and families?

How does the system ensure:

- a governing body that participates in key decision-making and oversight for the program, including the formation of the Policy Council structure and function?
- a formal structure of policy groups and Parent Committees with appropriate composition and process of formation?
- the assignment of appropriate governing body and policy group responsibilities, including the development, review, and approval/disapproval of program policies and procedures?
- written internal dispute resolution procedures for conflicts between the governing body and policy group?
- inclusive and well-functioning Parent Committees?

• *REFER TO*—Information on governance gathered from the Family Group Interview, Governing Body Interview, and Policy Council Interview.

• *OBSERVE*—Policy Council meeting.

• *INTERVIEW*—As needed, any additional governing body and policy group members, and staff.

• *REVIEW*—Policies and procedures pertaining to governance; written definitions of roles and responsibilities of governing body members; evidence of training; governing body and Policy Council bylaws; selection of minutes of governing body, Policy Council, Policy Committee, and Parent Committee meetings; and grantee and delegate agency agreements (if applicable).

Question 1. Program Governance. How effective is the grantee’s system of shared governance in supporting the implementation of quality services to children and families?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 2. PLANNING**STANDARDS**

How effective is the grantee's ongoing system of program planning in supporting the implementation of quality services to children and families?

1304.51(a); 1305.3; 1306.30(a);
1306.30(d); 1306.31–1306.36;
1308.4

How does the system ensure:

- a community assessment that is used for program planning, including selection of appropriate program options?
- consultation with the grantee's governing body, policy groups, staff, and other community organizations?
- long-range goals and short-term program and financial objectives that address the findings of the community assessment, are consistent with the philosophy of Head Start, and reflect the findings of ongoing monitoring and the self-assessment?
- written plan(s) for implementing quality services for children and families, and supporting pregnant women as appropriate, that result in positive outcomes and are reviewed, revised, and updated as needed?

• *REFER TO*—Information on planning gathered from the Governing Body Interview and Policy Council Interview.

• *INTERVIEW*—As needed, any additional staff, governing body members, or parents as to their involvement in and knowledge of the program's planning process.

• *REVIEW*—The community assessment, statement of long-range goals and short-term objectives, decision-making about program options, and written plan(s).

Question 2.

Planning. How effective is the grantee's ongoing system of program planning in supporting the implementation of quality services to children and families?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 3. COMMUNICATION

STANDARDS

How effective is the grantee's communication system in supporting the implementation of quality services to children and families?

1304.20(c)(1); 1304.22(a)(4);
1304.22(b)(3); 1304.41(a)(1);
1304.51(b)–1304.51(f);
1308.4(l)

How does the system ensure:

- effective communication between staff and parents, carried out on a regular basis throughout the program year and in the primary or preferred language of parents?
- that required information is shared among staff, the governing body, and policy group? (This information includes reports; HHS policies, guidelines, and communication; and program plans, policies, procedures, and grant applications.)
- that delegate agency governing bodies, Policy Committees (when applicable), and staff receive all regulations, policies, and other pertinent communication in a timely manner?
- strong communication, cooperation, and information sharing among agencies and their community partners (e.g., LEA or Part C agency, child care providers, etc.)?
- regular communication among all staff?

• *REFER TO*—Information on communication gathered from the Family Group Interview, Governing Body Interview, and Policy Council Interview.

• *OBSERVE*—Focus children's settings using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments.

• *INTERVIEW*—As needed, any additional staff, parents, delegate agency staff, and community partners regarding the quality and extent of communication in the program.

• *REVIEW*—Examples of written communication among staff, such as minutes of meetings, reports, and memos; policies and procedures pertaining to communication; examples of written communication between the program and families, the program and its governing body and policy groups, and the program and child care and community partners; and examples of minutes of governing body and policy group meetings.

Question 3. Communication. How effective is the grantee's communication system in supporting the implementation of quality services to children and families?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 4. RECORD-KEEPING AND REPORTING**STANDARDS**

How efficient and effective are the record-keeping and reporting systems in providing accurate, confidential, and timely information regarding children, families, and staff and in supporting quality services?

How are the record-keeping and reporting systems used to manage data and generate status reports that:

- identify and report program progress toward goals and objectives, and result in revised plans for the implementation of services as necessary?
- provide information on preschool children's progress?
- control program quality and maintain program accountability?
- advise Federal staff, governing bodies, policy groups, and staff of progress in implementing services?
- identify and report child abuse and neglect in compliance with applicable State and local laws?

1301.30; 1304.20(e)(5);
1304.22(c)(3)–1304.22(c)(5);
1304.51(g)–1304.51(h);
1304.52(k)(3)(i); 1308.4(l);
1308.6(e)(4)

- *REFER TO*—Information on record-keeping and reporting gathered from the Family Group Interview, Governing Body Interview, and Policy Council Interview.
- *INTERVIEW*—As needed, program management personnel about what kinds of data are collected, how data are organized, and what reports are prepared; and policy group members and members of the governing body about the extent and quality of reporting.
- *REVIEW*—Program policies and procedures pertaining to confidentiality; files of focus children and families (including assessment data); a selection of status reports; and a selection of reports for the governing body, policy group(s), and staff.

Question 4.

Record-Keeping and Reporting. How efficient and effective are the record-keeping and reporting systems in providing accurate, confidential, and timely information regarding children, families, and staff and in supporting quality services?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 5. ONGOING MONITORING**STANDARDS**

How effective is the grantee's ongoing monitoring system in supporting the implementation of quality services to children and families?

1304.51(i)(2)–1304.51(i)(3);
1308.4(d); Part 74.51;
Part 92.40

How does the system ensure:

- the ongoing implementation of Federal regulations, including the analysis and use of data contained in written reports, tracking systems, and the on-site observation and supervision of staff?
- ongoing monitoring to ensure tracking of patterns of progress and accomplishments for groups of children in learning and development, as well as in health and disabilities services and family and community partnerships?
- effective oversight of the delegates' ongoing implementation of the Performance Standards and other Federal regulations, when applicable?

- *REFER TO*—Information on ongoing monitoring gathered from the Family Group Interview, Governing Body Interview, and Policy Council Interview.
- *OBSERVE*—Centers and/or family child care homes and focus children's settings using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments.
- *INTERVIEW*—As needed, program management personnel and any additional staff to determine the implementation of a monitoring process within the grantee and any delegate agencies.
- *REVIEW*—Program policies and procedures pertaining to ongoing monitoring; any written documentation of periodic monitoring activities, including reports to any delegate agencies; the Transportation Services Checklist; and the Health and Safety Checklist.

Question 5. Ongoing Monitoring. How effective is the grantee’s ongoing monitoring system in supporting the implementation of quality services to children and families?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 6. SELF-ASSESSMENT	STANDARDS
<p>How effective is the grantee’s approach to self-assessment in supporting the implementation of quality services to children and families?</p> <p>How does the system ensure that:</p> <ul style="list-style-type: none">• the self-assessment examines the effectiveness and progress in meeting the grantee’s goals and objectives and the implementation of Federal regulations?• the process involves policy groups, parents, and as appropriate, other community members?• the grantee analyzes the results of the self-assessment and uses the information to address continuous improvement and to inform the grantee’s planning process?	<p>1304.51(i)(1)–1304.51(i)(3)</p> <hr/> <p>• <i>REFER TO</i>—Information on self-assessment gathered from the Governing Body Interview and Policy Council Interview.</p> <p>• <i>INTERVIEW</i>—As needed, program management personnel, policy group members, and staff or governing body members regarding their involvement in the self-assessment process, its results, and any actions taken in response to the results.</p> <p>• <i>REVIEW</i>—The annual self-assessment data and analysis, including progress toward meeting program goals and objectives and the implementation of Federal regulations.</p>

Question 6.

Self-Assessment. How effective is the grantee's approach to self-assessment in supporting the implementation of quality services to children and families?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 7. HUMAN RESOURCES

STANDARDS

How effective is the grantee's human resources management system in supporting the implementation of quality services to children and families?

How does the system ensure that:

- the organizational structure supports the accomplishment of the grantee's goals and objectives?
- all required functions (e.g., management, content area experts, etc.) are appropriately assigned?
- there are adequate provisions for staff supervision and support, including annual performance appraisals?
- all staff are qualified for their positions?
- services for children meet the staffing requirements set out in the Performance Standards?
- appropriate standards of conduct are delineated and followed?
- staff do not pose a significant risk to the health and safety of children and families?
- the training and development system provides a structured approach to assisting staff, governing body members, Policy Council members, and volunteers in acquiring or increasing the knowledge and skills needed to fulfill their job responsibilities, including the areas of child abuse and neglect, transportation, and transitions?

1301.31, including Appendix A—Identification and Reporting of Child Abuse and Neglect; 1304.24(a)(2)–1304.24(a)(3); 1304.52; 1306.20–1306.23; 1308.4(e); 1308.4(k); 1310.16–1310.17

- *REFER TO*—Information on human resources management gathered from the Family Group Interview, Governing Body Interview, and Policy Council Interview.
- *INTERVIEW*—As needed, program management personnel, policy group members, volunteers, and staff to clarify position assignments, the staff appraisal process, and training and development activities.
- *REVIEW*—Program personnel policies, a set of teacher files to check for the status of CDA and progress towards obtaining 2-year and 4-year degrees, a set of staff files to check for written documentation on staff background and qualifications, initial employment information and performance appraisals, the Transportation Services Checklist, written documentation on professional development and training opportunities, and any written information on staff-child ratios.

Question 7. Human Resources. How effective is the grantee’s human resources management system in supporting the implementation of quality services to children and families?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 8. FISCAL MANAGEMENT**STANDARDS**

How effective is the fiscal management system in supporting the implementation of quality services to children and families?

How does the system ensure that:

- the fiscal health of the organization is maintained?
- clear and appropriate internal control and monitoring procedures are in place to safeguard assets, check the accuracy and reliability of accounting data, and promote operating efficiency?
- the budget is revised to ensure fiscal program accountability and compliance with Federal laws and regulations?
- financial reports are consistent, timely and accurate reflecting the appropriate use of funds to support quality services?
- the governing body is providing sufficient oversight?

1301.10-1301.13, (Subpart B);
1301.20-1301.21, (Subpart C);
1301.32-1301.33; 1304.20(c)(5);
1304.23(b)(1)(i); 1304.40(d)(1)(i);
1304.50(f); 1304.50(g)(2);
1304.51(h)(1)-1304.51(h)(2);
1304.51(i)(2); 1304.52(d)(8);
1304.53(b)(1); 1305.9; 1306.30(d);
1308.4(m)-1308.4(o); 1310.23(b);
Part 74, Subpart C; Part 92, Subpart C;
2 CFR Part 220, Appendix A(A)(2);
2 CFR Part 220, Appendix A(C)(2);
2 CFR Part 220, Appendix A(G)(1)(g);
2 CFR Part 220, Appendix A(J)(a);
2 CFR Part 220, Appendix A(J)(b)(8);
2 CFR Part 225, Appendix A(C)(1)(a)
– Appendix A(C)(1)(j); 2 CFR Part
225, Appendix A(C)(3)(a) – Appendix
A(C)(3)(d); 2 CFR Part 225, Appendix
A(H)(1)-Appendix A(H)(2); 2 CFR Part
225, Appendix B(32)(a) – Appendix
B(32)(b); 2 CFR Part 230, Appendix
A(A)(2)(a)-Appendix A(A)(2)(g);
2 CFR Part 230, Appendix A(D)(1)(b);
2 CFR Part 230, Appendix A(E)(2)(c);
2 CFR Part 230, Appendix A(E)(2)(g);
2 CFR Part 230, Appendix B(8)(c)(1);
2 CFR Part 230, Appendix B(37)(b)(8);
OMB Circular A-133, Subpart B.220;
OMB Circular A-133, Subpart C.315(a)
– Subpart C.315(b)

- *REFER TO*—Information on fiscal management gathered from the Governing Body Interview and Policy Council Interview.
- *INTERVIEW*—As needed, the fiscal officer regarding the system of fiscal management and program management, governing body members, and policy group members about their involvement in fiscal management of the program.
- *REVIEW*—Items listed on the FY 2006 Fiscal Checklist.

Question 8.

Fiscal Management. How effective is the fiscal management system in supporting the implementation of quality services to children and families?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 9A. PREVENTION AND EARLY INTERVENTION FOR HEALTH AND NUTRITION**STANDARDS**

How does the grantee implement a comprehensive system of services for preventing health problems, and intervening promptly when they exist?

How does the grantee ensure that:

- in collaboration with parents, children have an ongoing source of continuous, accessible health care within required timeframes?
- in collaboration with parents, children are kept current on well-child care, including immunizations, according to recommended EPSDT and CDC schedules; and age-appropriate screenings took place within designated timeframes?
- in collaboration with parents and within required timeframes, children have a designated, accessible dental home.
- the health and safety of children is assured through (1) injury prevention measures; (2) hygiene procedures; (3) the establishment and practice of effective health emergency procedures, including methods for handling suspected or known child abuse and neglect; (4) conditions of short-term exclusion and admittance; (5) medication administration procedures; and (6) the availability of first aid kits?
- in collaboration with parents, children receive further diagnostic testing and/or treatment of health and developmental problems identified during well-child examinations or during screenings within required timeframes; IEP/IFSP services and individualization take place reflecting each child's characteristics, strengths and needs?
- pregnant women enrolled in EHS are assisted in accessing prenatal and postpartum care and are provided with prenatal education?
- staff and families work together to identify and meet children's nutritional needs (taking into account relevant assessment data and special dietary or feeding requirements); effective dental hygiene is practiced; applicable food safety and sanitation laws are met; and developmentally appropriate foods are served within suitable timeframes?

1304.20; 1304.21(c)(1)(iii); 1304.22-1304.24; 1304.40(c)(1)(i)-(iii); 1304.40(c)(2)-(3); 1304.40(f); 1304.40(i)(6); 1304.41(a)(2); 1304.41(b); 1304.51(c); 1304.52(d)(3); 1304.53(a)(6); 1304.53(a)(8); 1304.53(a)(10)(i)-(iii); 1304.53(a)(10)(v)-1304.53(a)(10)(xvii); 1306.30(c); 1306.33(c)(3); 1308.6; 1308.20; 1310.21

- *REFER TO*—Information on prevention and early intervention gathered from the Family Group Interview and the Community Partnerships Interview.
- *OBSERVE*—Centers with focus children using the Classroom, Family Child Care, or Socialization Experience Observation Instrument and the Health & Safety Checklist; Focus child homes using the Home Visit Observation Instrument; dental hygiene; food preparation and storage; food transport (if applicable); posted inspections; food/formula served; and bus safety (Transportation Services Checklist).
- *INTERVIEW*—As needed, health and nutrition staff/consultants; staff who perform screenings or who assist parents with child health needs; bus drivers/monitors; enrolled pregnant women; HSAC members, community partners and parents about prevention and early intervention.
- *REVIEW*—The Health Services Protocol and Nutrition Services Protocol; focus child files for results from (and the timeliness of) developmental screenings, examinations, further diagnostic testing (as needed) and ongoing observations; pregnant women files for prenatal care; safety checklists; accident/injury reports; service plans/P&P; HSAC minutes; menus; training/HR files; inspection reports; interagency agreements; Community Assessment; Self Assessment; Resource Directory and parent communication.

Question 9a. Prevention and Early Intervention for Health and Nutrition. How does the grantee implement a comprehensive system of services for preventing health problems, and intervening promptly when they exist?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 9B. MANAGING HEALTH AND NUTRITION SERVICES**STANDARDS**

How does the grantee effectively manage health and nutrition services, including tracking of all child health and developmental services to ensure that follow-up services are received in a timely manner?

1304.20(c)-1304.20(f);
1304.41(a)(1); 1304.51(g);
1308.18

How does the grantee ensure that:

- effective tracking of medical/dental examinations, screening results and applicable risk-assessment (i.e., lead or TB exposure) or testing exists?
 - medical, developmental and dental follow-up care is accomplished in a timely manner and monitored through resolution of the problem (treatment complete), if applicable; and effective procedures exist to identify new or recurring concerns to facilitate timely referrals and intervention?
 - mechanisms are in place that support communication among staff, parents, and community providers to assure follow-up services are received, while maintaining confidentiality standards?
 - there is participation in USDA Child nutrition programs and that the design and implementation of the nutrition program meets the nutritional needs and feeding requirements of each child, including those with special dietary needs and children with disabilities, and that parents and community partners are involved in nutrition services?
 - systems are in place to ensure that family-style meals are appropriately scheduled and managed; a variety of foods are served taking into account the cultural and ethnic preferences of families; and opportunity is provided for children to be involved, as developmentally appropriate, in food-related activities?
-
- *REFER TO*—Information on the management of health and nutrition services gathered from the Family Group Interview and the Community Partnerships Interview.
 - *OBSERVE*—Interactions between staff, parents and community partners; security of files; child health status; communication sources; meal service (center-based and socialization); and infant/toddler feedings.
 - *INTERVIEW*—Staff responsible for overseeing tracking of medical, developmental and dental follow-up care; teachers and/or home visitors; parents about assistance from the program in obtaining needed services; community partners, including HSAC members; individuals responsible for the management of nutrition services (including consultants, if available); and classroom staff about family-style meals and infant/toddler feedings.
 - *REVIEW*—The Health Services Protocol and Nutrition Services Protocol; Child files; the health tracking system and its relationship to the grantee's record-keeping and reporting system (Core Question #4); monitoring reports; training records to ensure staff competence; Service Plans/Policies & Procedures; Policy Council, Parent Committee or HSAC minutes; Community Assessment; Interagency Agreements; and classroom schedules.

Question 9b.

Managing Health and Nutrition Services. How does the grantee effectively manage health and nutrition services, including tracking of all child health and developmental services to ensure that follow-up services are received in a timely manner?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 10. INDIVIDUALIZATION	STANDARDS
<p>How does the grantee individualize the program of child development and health services to meet each child's unique characteristics, strengths, and needs, as determined in consultation with the family?</p> <p>How does the grantee ensure that:</p> <ul style="list-style-type: none"> • individualization is based on the results of ongoing child assessment linked to curriculum goals and reflected in the program's curriculum, planning, record-keeping, and family partnership process? • individualization addresses child interests, learning and development, temperament, language, cultural background, and learning style? 	<p>1304.20(d); 1304.20(f); 1304.21(a); 1304.21(b); 1304.21(c)(1)(i); 1304.23(b)(1); 1304.40(a)(2); 1308.19</p>
<ul style="list-style-type: none"> • <i>REFER TO</i>—Information on individualization gathered from the Family Group Interview. • <i>OBSERVE</i>—Focus children's settings for evidence of individualization of the curriculum based on the ongoing assessment information using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments. • <i>INTERVIEW</i>— Teachers and/or home visitors, family child care teachers, and parents of the focus children about how the program individualizes services, using information gathered from the ongoing assessment of children. • <i>REVIEW</i>—Relevant components of the Health Services Protocol and Nutrition Services Protocol, relevant components of the Early Childhood Development Protocol (available Fall 2005), written curriculum, periodic recordings of each child's developmental progress, and the program's plan for services for children. 	

Question 10. Individualization. How does the grantee individualize the program of child development and health services to meet each child's unique characteristics, strengths, and needs, as determined in consultation with the family?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 11. MENTAL HEALTH	STANDARDS
<p>How does the grantee implement a comprehensive system of mental health prevention and intervention to children and families, including providing mental health awareness and education to staff?</p> <p>How does the grantee ensure that:</p> <ul style="list-style-type: none"> the program is designed and managed to ensure that the service of a mental health professional (or professionals) is on a regular schedule of sufficient frequency to ensure the timely and effective identification of and intervention in family and staff concerns about a child? other community mental health resources are used as needed? each child receives an appropriate and timely (within 45 days of the child's entry into the program) screening to identify, using multiple sources of information, and address any behavioral, social, emotional concerns? the staff work with parents to discuss and identify appropriate responses to their children's behavior including how to strengthen nurturing, supportive environments and relationships in the home and at the program? parents receive mental health education on issues that place families at risk (including, for pregnant women, education and referrals if needed for maternal depression and substance abuse) and other appropriate intervention, including opportunities to participate in counseling programs? parents, program staff and the mental health professional design and implement program practices that are responsive to the identified behavioral and mental health concerns of an individual or group of children including providing special help to children with atypical behavior? 	<p>1304.20(a)(1)(ii)-1304.20(a)(1)(iv); 1304.20(b); 1304.20(c)(1); 1304.20(d); 1304.20(e)(2)-1304.20(e)(3); 1304.20(f)(1); 1304.21(a)(3)(i); 1304.21(b)(1)(i)-1304.21(b)(1)(iii); 1304.21(b)(2)(i); 1304.21(c)(1)(iii)-1304.21(c)(1)(vi); 1304.24; 1304.40(b); 1304.40(c)(1)(iii); 1304.40(c)(2); 1304.40(f)(1); 1304.40(f)(4); 1304.41(a)(1)-1304.41(a)(2); 1304.41(c)(1)(iii); 1304.51(a)(1)(iii);</p>
<ul style="list-style-type: none"> <i>REFER TO</i>—Information about mental health services gathered from the Family Group Interview. <i>OBSERVE</i>—Centers and/or family child care homes for evidence of supporting children's mental health needs; staff and child interactions. <i>INTERVIEW</i>—Relevant community partners (i.e. mental health professionals; mental health referral sources); focus families; mental health staff; family service staff; education staff and management about how the mental health plan is developed and implemented; how progress is monitored; how atypical behavioral needs are addressed; how families are involved in mental health service; how families and staff receive information related to mental health; and whether mental health services meet families expectations and circumstances. <i>REVIEW</i>—The Mental Health Services Protocol; the grantee's plan for mental health services; mental health contract and/or memorandum of agreements with mental health professionals or agencies if applicable; mental health professional's qualifications; child and family service records; training plan or training agendas (any evidence of training and/or educational opportunities for parents and staff re: mental health); relevant individual child or family plans (IFSPs, IEPs); and results from behavioral screenings. 	

Question 11. **Mental Health.** How does the grantee implement a comprehensive system of mental health prevention and intervention to children and families, including providing mental health awareness and education to staff?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 12. DISABILITIES SERVICES

STANDARDS

How does the grantee ensure that individualized services are effectively provided to children with diagnosed or suspected disabilities?

How does the grantee ensure that:

- its program is designed and managed to make at least ten percent of its enrollment opportunities available to children with disabilities and support the effective inclusion of these children and their families in the full range of program activities?
- its services to children with disabilities and their families are well coordinated with community partners, particularly the local education agencies (LEAs) and Part C agencies responsible for implementing the Individuals with Disabilities Education Act?
- the need for any early intervention, special education, and/or related services are identified promptly and in coordination with the Part C agency and/or LEA?
- children determined to have disabilities receive special education and related services needed through implementation of an IEP/IFSP?
- parents of children with disabilities are supported and involved as decision-makers and receive information and assistance in understanding and advocating for services and support needed to address their child's special needs?

1301.10(a); 1304.20(b)(1);
1304.20(c)(4); 1304.20(d);
1304.20(f)(2)(i)-1304.20(f)(2)(iv);
1304.21(a)(1)(ii); 1304.21(a)(5);
1304.21(c)(1); 1304.22(c);
1304.23(a)(2); 1304.23(b)(1);
1304.40(a)(3); 1304.40(e)(3);
1304.40(h)(1); 1304.41(a)(1)-
1304.41(a)(2); 1304.41(a)(4);
1304.41(c)(2); 1304.51(a)(1)(ii)-
1304.51(a)(2); 1304.51(g);
1304.51(i)(1); 1304.52(a)(1);
1304.52(a)(2)(ii); 1304.52(d)(7);
1304.52(k)(3); 1304.53(a)(2);
1304.53(a)(10)(xvii); 1304.53(b)(1);
1305.3(c); 1308.4; 1308.18(c);
1308.19(b)-1308.19(d); 1308.19(e)(4);
1308.19(i); 1308.19(j); 1308.19(k);
1308.20(a)-1308.20(c); 1308.21(a)(1)-
1308.21(a)(7); 1308.21(a)(10);
1308.21(b)-1308.21(c); 1308.5(a)-
1308.5(c); 1308.6(a); 1308.6(e)(1)-
1308.6(e)(5); 1310.22(c)

- *REFER TO*—Information on services to children with disabilities gathered from the Family Group Interview and Community Partnerships Interview.
- *OBSERVE*—Focus children's settings for evidence of individualization of the curriculum based on the ongoing assessment information using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments.
- *INTERVIEW*—Teachers and/or home visitors, family child care teachers, and parents of the focus children about how the program individualizes services, using information gathered from the ongoing assessment of children.
- *REVIEW*—The Disabilities Services Protocol, written curriculum, periodic recordings of each child's developmental progress, and the program's plan for services for children.

Question 12. Disabilities Services. How does the grantee ensure that individualized services are effectively provided to children with diagnosed or suspected disabilities?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 13. CURRICULUM AND ASSESSMENT

STANDARDS

How has the grantee engaged in a process of curriculum selection and/or development, implementation, and evaluation resulting in a written plan that supports the growth of children's social competence, including school readiness, for each identified program option?

1304.3(a)(5); 1304.21;
1304.23(b)–1304.23(c);
1304.40(e)–1304.40(f);
1306.30(b);
1308.4(c); 1310.21

How does the grantee ensure that:

- the written curriculum includes (a) goals for children's development and learning; (b) the experiences through which children will achieve these goals; (c) what staff and parents can do to help children achieve these goals; (d) the materials needed to support the implementation of the curriculum towards achieving the stated goals; and (e) consistency with the Performance Standards and sound child development principles?
- the curriculum implementation, including assessment, provides appropriate environments and comprehensive programming for children from birth to age five?
- ongoing child assessment (a) is linked to curriculum goals and (b) provides for the collection of information on children's progress?
- the curriculum and assessment process support the inclusion of children with disabilities?
- parents are involved in curriculum implementation and reporting child progress?

- *REFER TO*—Information about curriculum development and implementation, including the linkages with child assessment, gathered from the Family Group Interview.
- *OBSERVE*—Focus children's settings using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments.
- *INTERVIEW*—As needed, teachers and/or home visitors, family child care teachers, family workers, and parents of the focus children about their involvement in curriculum development and their knowledge and involvement of its implementation in the program.
- *REVIEW*—The Early Childhood Development Protocol (available Fall 2005), the grantee's plan for child development services, the written curriculum, daily schedules, and the Transportation Services Checklist.

Question 13. Curriculum and Assessment. How has the grantee engaged in a process of curriculum selection and/or development, implementation, and evaluation resulting in a written plan that supports the growth of children’s social competence, including school readiness, for each identified program option?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 14. FAMILY PARTNERSHIP BUILDING**STANDARDS**

How does the grantee engage in a process of collaborative partnership building with parents?

How does the grantee ensure that:

- meetings and one-on-one interactions are respectful of each family's diversity and cultural background?
- opportunities exist for parents to develop relationships with program staff and to participate in an individualized family partnership agreement process?
- staff work with families throughout the year to identify family goals, strengths, and necessary services and supports, and to describe progress in achieving family goals?
- staff work with parents to identify and access services and resources responsive to their interests and goals, and follow up with them to ensure that the referrals met their expectations and circumstances?
- for programs that enroll pregnant women, infants, and toddlers, assistance is available to mothers in accessing comprehensive prenatal and postpartum care?

1304.20(e); 1304.21(a)(2);
1304.23(b)(4); 1304.40;
1304.50(a)(1); 1306.30(b);
1308.19(j); 1308.21

• *REFER TO*—Information on family partnership building gathered from the Family Group Interview.

• *OBSERVE*—Focus children's settings using the Classroom, Family Child Care, or Socialization Experience and/or the Home Visit Observation Instruments.

• *INTERVIEW*—Relevant community partners and, as needed, focus families and family services personnel and other staff working with families about how the program partners with parents, how the family partnership agreement process is developed and implemented, how progress is monitored, how families are connected to community resources, and what services are provided to families with pregnant women.

• *REVIEW*—Conversation or anecdotal notes; any evidence describing family goals and progress in meeting them, such as family portfolios; information on pre-existing plans with other agencies, when applicable; and the program's written plan for family and community partnerships.

Question 14. Family Partnership Building. How does the grantee engage in a process of collaborative partnership building with parents?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 15. PARENT INVOLVEMENT

STANDARDS

How does the grantee provide parent involvement opportunities?

1304.20(e)(4); 1304.23(d);
1304.24(a)(1);
1304.40(b)–1304.40(h);
1304.50; 1308.19(j); 1308.21

How does the grantee ensure that:

- parents are involved in the development of the program of services for children, including home visits; parent conferences; the delivery of health care services to children; the development of the curriculum; planning, implementing, and evaluating nutrition services; and developing and implementing services for children with disabilities?
- opportunities are responsive to the ongoing and expressed interests and needs of individual parents and groups of parents?
- parents have opportunities to enhance their skills and knowledge in the following areas:
 - knowledge of child growth and development, the program's curriculum, the child assessment process, and parenting skills;
 - prevention of child abuse and neglect;
 - family literacy;
 - medical, dental, mental health and nutrition (encouraging parents to become active partners in their child's health care process and learn the principles of preventive health and safety);
 - community advocacy (encouraging parents to influence the character and goals of community services);
 - transition activities (assisting parents in becoming their child's advocate as the child moves to public school or another child care setting);
 - prenatal education on fetal development, labor and delivery, and postpartum recovery, as appropriate?

• *REFER TO*—Information on parent involvement gathered from the Family Group Interview.

• *INTERVIEW*—As needed, focus families, family services and other staff working with families, policy group members, and relevant community partners about how the agency plans for and fosters parent involvement.

• *REVIEW*—Documentation of home visits and parent/teacher conferences, records of parent involvement activities, documentation of parent participation in Parent Committee and policy groups, staff or parent training records, and the program's plan for parent involvement.

Question 15. Parent Involvement. How does the grantee provide parent involvement opportunities?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 16. COMMUNITY PARTNERSHIPS	STANDARDS
<p>How does the grantee take an active role in community planning and advocacy to improve the delivery of services to children and families?</p> <p>How does the grantee:</p> <ul style="list-style-type: none"> • develop community partnerships, supported by interagency agreements, as appropriate (e.g., with the LEA or Part C agency, child protective services, or local transportation system)? • establish collaboration within the grantee agency and across agencies? • promote the access of children, families, and pregnant women, as appropriate, to community services that are responsive to their needs, such as child care? • coordinate services to children with disabilities and their families with community agencies? • encourage volunteers to participate in Head Start? • support the transitions of families in, through, and out of Head Start and Early Head Start? • establish and maintain an effective Health Services Advisory Committee that includes parents, professionals, and other volunteers from the community? • establish and maintain other service advisory committees as appropriate to address program issues and to help the program respond to expressed family and community needs? 	<p>1304.23(b)(4); 1304.24(a)(3)(iv); 1304.40(e)(4); 1304.41; 1308.4(l); 1310.23</p>
<ul style="list-style-type: none"> • <i>REFER TO</i>—Information on community partnerships gathered from the Family Group Interview, Governing Body Interview, Policy Council Interview, Child Care Partnerships Interview, and Community Partnerships Interview. • <i>INTERVIEW</i>—As needed, a small number of community partners; focus families; Health Services Advisory Committee members and other advisory group members, as appropriate; and staff (including disabilities services staff) about the existence and effectiveness of community partnerships and interagency services for children and their families. • <i>REVIEW</i>—Interagency agreements; community resource guide to determine if it addresses families' comprehensive needs; the program's plan for community involvement, planning, assessment, and advocacy for all families; services for children with disabilities; and activities to facilitate transition. 	

Question 16. Community Partnerships. How does the grantee take an active role in community planning and advocacy to improve the delivery of services to children and families?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 17. ELIGIBILITY, RECRUITMENT, SELECTION, ENROLLMENT, AND ATTENDANCE STANDARDS

How does the grantee approach eligibility, recruitment, selection, enrollment, and attendance in an attempt to meet the needs of Head Start-eligible families and in response to the community assessment? | 1305.3–1305.8; 1308.5

How does the grantee:

- define the recruitment area?
- determine the eligibility of children, ensuring that no more than 10% come from families that exceed the low-income guidelines?
- ensure that at least 10% of enrollment opportunities are made available to children with disabilities?
- recruit those most in need of Head Start services, including previously underserved populations?
- select children and families based on enrollment criteria, and maintain a waiting list?
- assign children to program options that meet the needs of their families?
- meet the service requirements for each option?
- maintain the funded enrollment level, fill vacancies as they occur, and analyze enrollment data to inform the planning process?
- analyze the causes of absenteeism, when average daily attendance falls below 85%?

- *REFER TO*—Information on eligibility, recruitment, selection, enrollment, and attendance gathered from the Family Group Interview, Governing Body Interview, and Policy Council Interview.
- *INTERVIEW*—As needed, family services personnel, focus families, and policy group members.
- *REVIEW*—The current community assessment; eligibility, selection, and enrollment criteria; written information on the recruitment process and the recruitment area; the current waiting list of eligible children; income verification forms from focus children's records; class rosters and home visitor assignments; the set of attendance records; written enrollment procedures; evidence of recruitment and enrollment of children with disabilities; and the Policy Council meeting minutes concerned with eligibility, selection, and enrollment issues.

Question 17. Eligibility, Recruitment, Selection, Enrollment, and Attendance. How does the grantee approach eligibility, recruitment, selection, enrollment, and attendance in an attempt to meet the needs of Head Start-eligible families and in response to the community assessment?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

QUESTION 18. FACILITIES, MATERIALS, EQUIPMENT, AND TRANSPORTATION**STANDARDS**

How does the grantee ensure that facilities, materials, equipment, and transportation services, when they are provided, are safe, appropriate, and conducive to learning and reflective of the different ages and stages of development of each child, including children with disabilities, for the conduct of all program activities?

How does the grantee ensure that:

- construction of facilities and purchase of vehicles meet all requirements?
- required inspections, maintenance, and repairs are taking place, and facilities and transportation vehicles are in compliance with all relevant Federal, State, tribal, and local requirements?
- center-based environments are free of toxins, such as smoke, lead, pesticides, and herbicides?
- arrangements and space, as well as types and uses of materials and equipment, match the grantee's identified curriculum?
- the facilities, materials, equipment, and vehicles are accessible to persons with disabilities as required by Section 504 of the Rehabilitation Act?

1304.21(a)(4)(iv); 1304.21(a)(5)–
1304.21(a)(6); 1304.22(e)(7);
1304.23(e); 1304.53(a)(1)–
1304.53(a)(5); 1304.53(a)(6);
1304.53(a)(7)–(9);
1304.53(a)(10)(iv);
1304.53(a)(10)(xiv)–
1304.53(a)(10)(xv);
1304.53(a)(10)(xvii);
1304.53(b); 1306.30(c);
1308.4(o)(4)–1308.4(o)(6);
1310.10; 1310.12(b);
1310.13–1310.15(b); 1310.15(d);
1310.20; 1310.22(b); 1310.23;
45 CFR 84.5

- *REFER TO*—Information on facilities, materials, equipment, and transportation gathered from the Family Group Interview.
- *INTERVIEW*—As needed, a small number of staff to determine accommodations for children with disabilities or special needs and adequacy and maintenance of facilities, equipment, and transportation vehicles.
- *REVIEW*—The results from ongoing monitoring of health and safety, the annual safety inspection, licenses, maintenance logs, procurement requests and/or purchasing records (if needed), the Health and Safety Checklist, and the Transportation Services Checklist.

Question 18.

Facilities, Materials, Equipment, and Transportation. How does the grantee ensure that facilities, materials, equipment, and transportation services, when they are provided, are safe, appropriate, and conducive to learning and reflective of the different ages and stages of development of each child, including children with disabilities, for the conduct of all program activities?

NOTES ON ISSUES, QUESTIONS, AND FOLLOW-UP

Protocols

Protocols have been developed for FY 2006 to facilitate monitoring of health, nutrition, disabilities, mental health and early childhood development¹ services. The protocols provide an overarching framework as well as detailed guidance to help reviewers monitor compliance with the primary regulations and program requirements related to the respective services.

OVERVIEW

The protocol is designed to guide the reviewer in monitoring against specified standards. Each protocol is organized around a set of key questions. For each key question, the protocol provides the reviewer with a series of subquestions that, when addressed, assist in monitoring compliance with the specified standards. In addition, the protocols offer the reviewer recommended sources from which information can be collected to respond to the subquestions. Prompts are provided to cue the reviewer on what to look for in specific documents, questions to ask when conducting various interviews, or observations to make in various settings.

INSTRUCTIONS

The assigned reviewer(s) is required to complete the protocol. Completion of the protocol entails collecting sufficient evidence to support a preliminary decision on compliance with each of the standards associated with the key questions and/or the questions subsumed within the key questions. Reviewers are requested to document the sources from which they collect information (i.e., people interviewed, documents reviewed, or environment or setting observed) and what they found.

Each protocol includes tables into which the source and information acquired can be documented. In addition, a separate Protocol Worksheet is provided for reviewers to document review information. Please document all of the information you collect during the review on either the worksheet contained within the protocol or the separate Protocol Worksheet. This documentation should be submitted to the Report Coordinator at the end of the review.

RESOURCES

This section includes the following:

- Protocols: Health Services Protocol, Nutrition Services Protocol, Disabilities Services Protocol, and Mental Health Services Protocol
- A separate Protocol Worksheet that can be used in addition to the worksheet contained within the protocols
- Monitoring Reference Sheets for the Mental Health Services Protocol and Disabilities Services Protocol. These sheets describe references to mental health or disabilities services (respectively) that are contained in other Core Questions, and the information that may be available from other fellow reviewers.

¹ The Early Childhood Development Protocol will be available in Fall 2005; it is not included in the *PRISM Instrument*.

Protocol Worksheet

Reviewer Name: _____ Review Date: _____

Grantee (and if appropriate Delegate Name): _____

Protocol Type: (Health, Nutrition, Disabilities, MH, or ECD): _____

Source: Document Reviewed: _____

Person Interviewed: _____

Observation Setting: _____

Relevant citation number(s), if appropriate: _____

Notes:

Source: Document Reviewed: _____

Person Interviewed: _____

Observation Setting: _____

Relevant citation number(s), if appropriate: _____

Notes:

Health Services Protocol



(C) In collaboration with team members



(F) Focus child and family



(H&S) Included on Health & Safety Checklist

Prevention: Ongoing Source of Care

How does the grantee ensure that:

As determined in collaboration with parents, each child has an ongoing source of continuous, accessible health care within 90 days (30 day timeframe for programs of 90 days or less) of the child's first day of Early Head Start or Head Start services?

1304.20(a)(1)(i); 1304.20(a)(2)

Assistance is provided to parents in accessing a source of care, if indicated?

1304.20(a)(1)(i)




- What is the program's method for determining whether children have an ongoing source of health care?
- How does the program assist families that do not have a medical or dental home?
- What process does the program have to ensure that their list of health care providers/resource directory is up to date? How do they share this information with parents?
- What role, if any, does the HSAC play in identifying and recruiting potential health care providers for Head Start children and families?

	Suggested Sources	Actual Sources
Documents Reviewed	Service Plans/P&P Child files HSAC minutes Resource Directory Community Assessment	
Persons Interviewed	Health Manager Family Service Workers Parents HSAC members	

Notes:

Prevention: Ongoing Source of Care (Expanded Protocol)

Document Review:

- Review service plans and/or policies for ways in which the program ensures that each child has an ongoing source of continuous, accessible health care within the required timeframe.
- 
 • (F) Review child files to confirm documentation of an ongoing source of continuous, accessible health care (medical and dental home) within 90 days of entry into the program (30 days for programs of 90 days or less). Review processes that the program has to obtain information on community resources related to medical, dental and mental health care. In what way is this information kept current and how is it shared with parents?
- 
 • (C) Review the most recent Community Assessment to determine whether gaps in the availability of health or dental care have been identified by the program and whether short or long-term strategic plans address these access issues.
- 
 • (C) Review Health Services Advisory Committee (HSAC) minutes to determine the committee's role in identifying and recruiting medical and dental providers that are accessible and knowledgeable about the needs of Head Start and Early Head Start families.

Interview:

- Interview Health Services, Family Partnership and/or classroom staff to assess whether efforts are made during parent contacts to identify and address barriers to accessing medical or dental care (such as transportation, cultural or linguistic challenges, etc).
- Interview parents to determine their role in identifying an ongoing source of medical and dental care? If no source of care exists, in what way have program staff assisted the family in establishing a medical or dental home?

Prevention: Ongoing Source of Care

Notes:

Prevention: Determining Child Health Status

How does the grantee ensure that:

Within 90 days of child's entry (30 day timeframe for programs of 90 days or less) information has been obtained from a health care professional as to whether the child is up-to-date on a schedule of age appropriate preventive and primary care which includes medical, dental and mental health services? 1304.20(a)(1)(ii)

Early and Periodic Screening, Diagnosis and Treatment (EPSDT) program requirements, which are state-specific, and recommendations of the Centers for Disease Control and Prevention (CDC) are utilized to determine the appropriate schedule for well child care and immunizations? 1304.20(a)(1)(ii)

Assistance is provided to parents, when indicated, in making necessary arrangements to obtain and sustain recommended schedules of preventive and primary care?

1304.20(a)(1)(ii) (A-C)




- How does the program determine if a child is up to date on well child care and immunizations? Who makes the determination and what is done with the information?
- How does the program ensure that the full range of state EPSDT services is received?
- Did the program's Self Assessment address Health Services? Were significant strengths and concerns discovered? If there were concerns, were they addressed?
- How do staff learn the meaning of examination and test results?
- What type of assistance does the program provide to parents to ensure their children are up-to-date?
- How is missing EPSDT-recommended health or dental components handled?

	Suggested Sources	Actual Sources
Documents Reviewed	Child files/tracking logs EPSDT well child schedule CDC/State immunization recommendations Self Assessment HSAC minutes Training logs	
Persons Interviewed	Health Manager Family Service Workers (if applicable) Parents Health care providers (if applicable)	




Notes:

Prevention: Determining Child Health Status

Document Review:

- Determine whether current state-specific EPSDT schedules and national immunization recommendations (CDC/ACIP) are used by staff responsible for overseeing health services and those working with families to ensure up-to-date well child preventive and primary care.
-  • (F) Review child/family records to determine whether periodic well child examination forms, signed and dated by a health professional, are included in program files and that they occurred within 90 days of program entry. Is there evidence that abnormal findings noted during examinations are tracked to ensure progress and support until treatment is completed?
-  • (C) Review the most recent Community Assessment to determine what health care problems exist within the geographic area served by the program. What has the program done to address these issues?
-  • (C) Review the most recent Self-Assessment to determine if there were concerns identified related to children receiving examinations within required time frames. If problems were identified, what has the program done to address them?

Interview:

- Interview Health Services and Family Partnership staff to determine whether they are knowledgeable about the state periodicity schedule of well child visits and current immunization recommendations. What efforts have been made to collaborate with health care providers to facilitate access to needed examinations, vaccines, testing and/or treatment? How are parents informed about well child examinations, screenings or immunizations that are due or overdue?
-  • (C) Listen during PRISM interviews and staff discussions for community issues that could impact child/family health necessitating short or long-term local adaptations to state or national medical, dental and mental health recommendations (for example, past closure of a lead smelter in an adjacent community, lack of local dentists who accept Medicaid, a recent tragedy affecting the mental health of a small community).
-  • (C) Interview HSAC members to determine their role in making recommendations for adapting the schedule of well child care and for immunizations. Are there relevant and prevalent community health problems that necessitate these adaptations?
-  • (F) Interview focus families: In what way does the EHS/HS program provide support to ensure that well child visits occur at the recommended intervals? Has your family not obtained medical, dental or mental health services due to a barrier, such as funding, transportation or language?

Observation:

- Are EPSDT and immunization schedules posted or readily accessible to staff responsible for adherence and/or monitoring?
- Observe whether information is readily available to parents on how to obtain health insurance and ways to access medical, dental or other providers needed for their child and family.

Prevention: Determining Child Health StatusNotes:

Prevention: Screening for Developmental, Sensory and Behavioral Concerns

How does the grantee ensure that:




Culturally, linguistically and age-appropriate screening procedures are performed, in collaboration with each child's parent, within 45 days (30 day timeframe for programs operating 90 days or less) of entry into the program to identify concerns regarding a child's developmental, sensory, behavioral, motor, language, social, cognitive, perceptual and emotional skills? 1304.20(b)(1); 1304.20(a)(2) 1304.20(a)(1)(iii)

- What systems are in place to ensure that age-appropriate screenings take place within the required timeframe?
- Who performs screening tests? How does the program ensure that screening results are accurate?
- Do staff understand implications of test results?
- How are parents involved in the screening process?
- Is there a process for retesting children that are absent or uncooperative and ensuring further evaluation for those who fail screenings?

	Suggested Sources	Actual Sources
Documents Reviewed	Child files/tracking logs State EPSDT schedule of well child care Training records Interagency agreements	
Persons Interviewed	Health Manager Persons who perform screens Health Care Providers (if available) HSAC members Parents	

Notes:

**Prevention: Screening for Developmental, Sensory and Behavioral Concerns
(Expanded Protocol)**Document Review:

-  • (F) Review child health files to determine if age-appropriate screenings took place within 45 days (30 day timeframe for programs of 90 days or less) of entry into the program.
-  • (C) As applicable, review training records and/or education materials to show that EHS/HS staff, parents and/or volunteers have been properly taught to conduct screenings performed on-site.
-  • (C) (F) Review interagency agreements and/or child files for assurance that examinations, screenings and further diagnostic testing of EHS/HS children are performed by properly trained professionals.
- Review screening instruments used to ascertain whether they are standardized and appropriate to the program's needs and resources.

Interview:

- Interview EHS/HS employees that perform on-site screenings to ensure sufficient training. Are staff able to explain procedures and implication of test results? Do they understand the differences between screenings and diagnostic evaluation?
- Interview HSAC members to determine their role in ensuring screening tools are current, relevant and appropriate to the Early Head Start/Head Start population being served.
- Interview Parents: What information is shared with you about screening procedures that are performed to assess your child's senses and skills? How are you involved in the process?

Prevention: Screening for Developmental, Sensory and Behavioral ConcernsNotes:

Prevention: Injury Prevention

How does the grantee ensure that:

Staff and volunteers can demonstrate safety practices and foster safety awareness among children and parents by incorporating it into child and parent activities?

1304.22(d)(1)&(2)





- What systems are in place to prevent injuries?
- How do staff and volunteers learn about safety practices? How do children and parents learn about injury prevention?
- What routines are followed to ensure safe developmentally appropriate environments (classroom, playground, bus)?
- What processes are in place to ensure that children are supervised at all times and that they are released only to authorized persons?
- What happens if a child is injured? How and when is the family notified?
- Are injuries documented and evaluated? What is the process to ensure follow-up and reduced risk of reoccurrence, if applicable?

	Suggested Sources	Actual Sources
Documents Reviewed	Service Plans/P&P Training records Safety Checklists Accident/Injury Reports	
Persons Interviewed	Classroom Staff Volunteers (if applicable) Family Service Workers (if applicable) Parents Bus Driver or Monitor	
Observed	Classroom environment Playground/Large Motor Room Bus Home Setting	

Notes:

Prevention: Injury Prevention (Expanded Protocol)

Document Review:

- Review Service Plans and Policy & Procedure Manuals for clear protocols for prevention of injury.
-  • (C) Review policies on documentation of injuries and examine Incident/Accident Reports for patterns that deserve attention. Does it appear that one center has more injuries than others and if so, why? Are causes of incidents reviewed to determine whether improvement in the prevention or management of injuries is warranted?
-  • (H&S) Complete the Health & Safety Checklist at all centers visited and follow-up with on-site program staff about potential concerns. Are staff aware of these concerns and if so, what plans are in place to address them?
-  • (C) Review Training Records to determine whether ongoing instruction on safety practices and management of injuries is provided for staff, parents and volunteers. Are all staff certified in CPR and First Aid?
- Review procedures used by the program to assess safety and emergency preparedness. Review safety checklists developed by the program, such as used to inspect playgrounds. Note problems identified by staff and actions taken to correct unsafe conditions and prevent reoccurrence.
-  • (C) Review the most recent Self-Assessment. Were there findings related to injury prevention? If so, what has the program done to address these findings?

Interview:

- Interview classroom, volunteers, or Family Partnership staff: In what way are children and families made aware of safety practices and injury prevention? How have you learned about risk factors for childhood injuries and effective management when they occur?
- Interview teachers, bus driver and/or bus monitor: What program practices ensure that children are supervised at all times and that they are released only to authorized persons?
- Interview parents: Has your child been injured while attending the center and if so, were you immediately notified about the situation? Have classroom staff or home visitors discussed injury prevention or emergency response with you? If so, has your family made any changes aimed at preventing injuries or preparing for emergencies?

Prevention: Injury Prevention (Expanded Protocol) *continued*Observation:

- (C) Observe, while visiting centers, whether developmentally appropriate, safe environments exist and if there is sufficient adult supervision, including adequate staffing levels. Observe whether a child is left unattended or is out of sight of a staff person at any time while in the center, on the playground or while riding the bus.
- Observe practices consistent with injury prevention, such as children wearing helmets while riding bicycles or using age-appropriate safety restraints in vehicles. If these routines are not noted, has the program made efforts to address the issue or educate staff and families?
- Observe whether medications or potentially toxic materials are stored out of reach of children.
- Observe whether safety practices are modeled in the classroom and home setting and taught to children and families during daily activities.

Prevention: Injury PreventionNotes:

Prevention: Hygiene/Cleanliness of Indoor and Outdoor Premises

How does the grantee ensure that:

Staff, volunteers and children wash their hands with soap and running water after diapering and toilet use, with any food-related preparation or activity, whenever hands are contaminated with blood or other bodily fluids and after handling pets or other animals? 1304.22(e)(1)(i-iv)

Hand washing occurs before and after giving medications, bandaging a wound and after assisting a child with toilet use? 1304.22(e)(2)(i-iii)

Nonporous gloves are worn by staff when in contact with blood or other visibly bloody bodily fluids? 1304.22(e)(3)

Spills of bodily fluids are immediately cleaned and disinfected according to professionally established guidelines, as well as tools and equipment used to clean spills, and that blood-contaminated materials are disposed of in a plastic bag with a secure tie? 1304.22(e)(4)

Sanitation and hygiene procedures for diapering, that adequately protect the health and safety of children and staff, have been adopted and implemented? 1304.22(e)(5)

Potties used in center-based programs are emptied into the toilet and cleaned and disinfected after each use in a utility sink used for that purpose? 1304.22(e)(6)

Cribs and cots are spaced at least three feet apart to avoid spreading contagious illness and to allow for easy access to each infant or toddler? 1304.22(e)(7)

Indoor and outdoor premises are cleaned daily and kept free of undesirable and hazardous materials and conditions? 1304.53(a)(10)(viii)

- What procedures ensure that the EHS/HS environment minimizes risk of disease transmission?
- What training do staff and volunteers receive pertaining to hygiene, sanitation and disinfection procedures?
- How do children learn about good hygiene practices?
- Have any communicable disease outbreaks occurred? What happened and who was involved?
- Is evidence of good hygiene observed during center visits?


Prevention: Hygiene/Cleanliness of Indoor and Outdoor Premises *continued*

	Suggested Sources	Actual Sources
Documents Reviewed	Services Plans/P&P Training records	
Persons Interviewed	Health Manager Classroom staff/volunteers HSAC members Head Start child/parents	
Observed	Center environment Hand washing technique	


Notes:

Prevention: Hygiene/Cleanliness of Indoor and Outdoor Premises (Expanded Protocol)


Document Review:

- Review policies and procedures established by the program that promote good hygiene practices and effective ways to avoid spread of contagious illness.
-  • (C) Review Training Records of staff and volunteers for topics pertaining to hygiene, sanitation and disinfection procedures aimed at reducing the risk of infectious disease.

Interview:




- Interview staff or volunteers in contact with children: How are spills of bodily fluids (urine, feces, blood, saliva, nasal discharge, eye discharge) handled? How do you dispose of blood-contaminated or potentially infectious materials?
-  • (H&S) Interview caregivers about what diapering procedures are used to protect the health and safety of children and staff. How are potties in center-based programs emptied and sanitized?
- Interview management staff: In what way does the program stay current on child care licensing regulations and changes on the local, state, national or Tribal level related to health, hygiene and safety (example: discontinuation of Syrup of Ipecac, childhood influenza immunization recommendations)?
- Interview the Health Manager and/or HSAC member(s) to determine if there have been recent outbreaks of communicable diseases that could have been prevented through regularly practiced hygiene procedures? How did the program respond and what, if any, changes were made to prevent this from happening in the future?

Observations:

- Observe classroom staff and volunteers for evidence of good hygiene (effective hand washing practices, appropriate use of gloves, proper toothbrush storage, etc.) and effective cleaning/disinfecting techniques. Is running water accessible for children and staff, and are hand washing supplies available (disposable towels, soap)? Is there evidence that children are taught to properly wash their hands?
- Observe whether signs are posted at each sink with information on times when hand washing is required and steps to follow, if indicated by state child care licensing or health department regulations.
-  • (H&S) Observe in classrooms used for infants and toddlers whether cribs and cots are spaced at least three feet apart.

**Prevention: Hygiene/Cleanliness of Indoor and Outdoor Premises
(Expanded Protocol) continued**

Observations:

-  • (H&S) Observe whether nonporous gloves are available to all staff, home visitors and bus drivers who may be exposed to bodily fluids.
-  • (H&S) Observe whether cleaning materials are stored in locations inaccessible to children.
-  • (H&S) Observe whether indoor and outdoor premises are clean and that hazardous conditions (i.e., poisonous plants, pest infestations) do not exist around Head Start facilities.

Prevention: Hygiene/Cleanliness of Indoor and Outdoor Premises

Notes:

Prevention: Pregnant Women and Newborn Care

How does the grantee ensure that:

Pregnant women are assisted in accessing early and regular (per provider schedule) comprehensive prenatal and postpartum care, including medical and dental examinations and recommended treatment? 1304.40(c)(1)(ii)

Early and continuing risk assessments occur during pregnancy with intervention, when indicated (such as nutrition counseling, substance abuse prevention and treatment services)? 1304.40(c)(1)(i)&(iii)

Prenatal education on fetal development, the benefits of breastfeeding and postpartum recovery is provided to pregnant women and other family members, as appropriate? 1304.40(c)(2)&(3)

Arrangements have been made for health staff to visit each newborn within two weeks of birth to ensure the well-being of both the mother and the child? 1304.40(i)(6)







- What systems exist to ensure that pregnant women obtain comprehensive prenatal and postpartum care?
- What training is provided to staff on risk assessments and applicable interventions?
- How do pregnant women learn about fetal development, the benefits of breastfeeding and postpartum recovery?
- What support is provided to the mother and newborn after delivery?

	Suggested Sources	Actual Sources
Documents Reviewed	Services Plans/P&P Pregnant women files Newborn files Training records Prenatal education materials Interagency agreements Resource Directory	
Persons Interviewed	Health or EHS Manager Family Service Workers Pregnant women served (if available) Health care providers/HSAC members (if available)	
Observed	Home visitation Socialization	



Notes:

Prevention: Pregnant Women and Newborn Care (Expanded Protocol)

Document Review:

- 
 - (F) Review files of enrolled pregnant women for provision of early and continuous prenatal care, including oral health services, and evidence of support from program staff.
- 
 - (F) Review files of enrolled pregnant women for evidence of risk assessments (including smoking and alcohol) with applicable preventive education and treatment.
- 
 - (F) Review files for documentation of prenatal education on fetal development, the benefits of breastfeeding and postpartum recovery (including maternal depression), as appropriate.
- 
 - (F) Review child files for evidence that an appropriately trained staff member or health professional has conducted a newborn visit within two weeks of delivery for early support and education to parents.
- 
 - (C) Review program records for evidence of staff training on relevant topics, i.e., prenatal care, lactation, risk factors impacting fetal and newborn health, fetal development and/or postpartum recovery (including maternal depression).
- 
 - (C) Examine interagency agreements for collaborations with professionals qualified to provide prenatal care, instruction (childbirth educators and lactation consultants) and intervention (mental health consultants; substance abuse counselors), when indicated.
 - Note whether community resource guides used by the program include sources related to pregnancy, parenting (including fatherhood initiatives) and newborn care.

Interview:

- 
 - Interview Family Service Workers with pregnant women on their caseload and/or the Health or Early Head Start (EHS) Manager: What efforts are made to ensure that prenatal and dental appointments are kept? In what way are risk assessments conducted and what is done with that information?
- 
 - (C) Interview Health Care Providers and Health Services Advisory Committee (HSAC) members, if available, to inquire about efforts to develop linkages within the community for services that assist pregnant women and the newborn child.
- Interview a pregnant woman: How have EHS staff assisted you in experiencing a healthy pregnancy? How have program staff assisted you and your family to be prepared for labor, delivery and the addition of a newborn baby into your home? What topics are covered during home visits? Have the benefits of breastfeeding been discussed with you?

Prevention: Pregnant Women and Newborn Care (Expanded Protocol) *continued*Observation:

- Observe during a home visit or socialization, whether prenatal education materials used by the Family Service Worker or other appropriate staff include discussions regarding proper health and nutrition during pregnancy, ongoing risk assessments, environmental exposures (alcohol, excessive caffeine, nicotine and recreational drugs), and fetal development.
- Observe whether provisions have been made by the program to ensure appropriate space and privacy for breastfeeding.

Prevention: Pregnant Women and Newborn CareNotes:

Early Intervention: Diagnostic Testing and Treatment

How does the grantee ensure that:

Further diagnostic testing, examination, and treatment by an appropriately qualified professional occur for each child with an observable, known or suspected health or developmental problem? 1304.20(a)(1)(iii)

A system of ongoing communication with parents of children with identified health needs occurs to facilitate implementation of the follow-up plan with assistance, as needed, for acquisition of prescribed medications, aids or equipment for medical and dental conditions? 1304.20(c)(1)&(2)

- What systems exist to ensure that further diagnostic testing, examination and treatment occurs for each child, when indicated?
- How are staff trained to assess whether screening results or suspected problems require intervention?
- How is ongoing communication with parents accomplished when health needs are identified?
- How does the program ensure that follow-up plans are implemented?
- In what ways do HSAC members and/or community partners assist in this process?

	Suggested Sources	Actual Sources
Documents Reviewed	Child files/tracking logs Service Plans/P&P Training records Interagency agreements	
Persons Interviewed	Health Manager Applicable center staff Parents HSAC members/community partners, if available	

Notes:

Early Intervention: Diagnostic Testing and Treatment (Expanded Protocol)

Document Review:



- (F) Review child files and tracking documents for timely and complete follow-up of health and developmental problems identified on well child examinations or during screenings arranged by the program.

- Is there evidence in Service Plans, Policies & Procedures or through interviews that staff obtain information on unfamiliar diagnoses in order to facilitate support to parents and to improve communication with health professionals on behalf of the affected child?



- (C) Review training records or other program documentation for evidence that staff learn to assess whether screening results or suspected health problems require evaluation or intervention.



- (C) (F) Review child files for communication with parents of children with identified health needs to facilitate follow-up for established diagnoses (such as asthma). Assess classroom and home visit notes for documentation of ongoing consultation with the family and health care providers. Do files show evidence of written parent consent for sharing information, when indicated, related to their child's health?



- (C) Review written interagency agreements or query staff about informal arrangements that support collaborations with community providers that are qualified and available to provide diagnostic testing, further examination and treatment of potential or known problems. Does the program have individuals on-site or by contract (Health Consultants) that keep current with health information advances and can apply that knowledge to the childcare setting?

Interview:



- (F) Interview staff working with children and those overseeing health services to ascertain whether they are knowledgeable about identified medical needs and recommended treatment (such as asthma in a focus child). Are staff able to recognize diagnoses found on medical or dental examination forms that require follow-up care?



- (C) Explore, during interviews with EHS/HS staff or family members, ways in which parents are assisted in understanding the importance of prevention, advocating for their child's health care needs and ensuring follow-up of suspected or diagnosed medical problems. Are parents assisted in obtaining medications, aids or equipment needed to meet a child's medical or dental needs?



- (C) Interview HSAC/Community Partners (if available): In what ways do you assist the program in supporting families with evaluating and addressing suspected or diagnosed health care or developmental needs.

Early Intervention: Diagnostic Testing and Treatment (Expanded Protocol) *continued*

Observation:



- (C) Observe for information on community resources (postings; brochures in centers or parent rooms, directories) and educational offerings that assist parents in being well-informed, effective health care consumers. What efforts are made to accommodate the needs of families that speak languages other than English?
- Observe whether staff display cultural sensitivity and show respect for families served by the program, particularly as related to beliefs about causes of illness and traditional healing practices.

Early Intervention: Diagnostic Testing and Treatment

Notes:

Early Intervention: IEP/IFSP Services and Individualization

How does the grantee ensure that:

Assistance is provided with the provision of related services addressing health concerns in accordance with the Individualized Education Program (IEP) and the Individualized Family Service Plan (IFSP)? 1304.20(c)(4)

Information from developmental, sensory and behavioral screenings, ongoing observations, medical and dental evaluations/treatments, in addition to input from parents, is used to individualize the EHS/HS program to reflect each child's characteristics, strengths and needs? 1304.20(f)(1)






- What systems are in place to ensure that each child with special needs has a written IEP/IFSP and is obtaining recommended services?
- How are staff trained to individualize instruction based on input from multiple sources and assessment of each child's strengths and needs?
- How are parents involved in the IEP/IFSP process?

	Suggested Sources	Actual Sources
Documents Reviewed	Child files/tracking log Service plans/P&P Training records Teacher notes/lesson plans	
Persons Interviewed	Health /Disability Manager Teachers Parents	
Observed	Classroom observations Center environment Home visit observations	





Notes:

Early Intervention: IEP/IFSP Services and Individualization (Expanded Protocol)

Document Review:

-  • (C) Review Service Plans or Policies & Procedures for a well-defined approach to referring children with suspected concerns or needed interventions in a timely and systematic manner.
-  • (F) Review child files or tracking logs for documentation of an IEP or IFSP for those children with identified health needs and/or evidence that staff have supported the family in accessing recommended services.
-  • (C) Review teacher notes and lesson plans for evidence that information from screening results and medical evaluations is utilized to individualize the curriculum in a determined effort to capitalize on each child's strengths and address particular needs.
 - Examine reports of infant and toddler ongoing observations (eating, sleeping, elimination and activity levels) and note how this information is exchanged with parents and used when planning daily routines.
-  • (F) Review documentation in child files of ongoing standardized assessments to determine whether children with test scores outside the "normal range" were re-tested and/or referred.
-  • (C) Assess training records for evidence that staff have received instruction on identification of medical, dental or developmental concerns and ways to individualize lessons based on each child's abilities and potential challenges.

Interview:

-  • (C) Interview the Health or Disability Manager: What systems are in place to ensure that each child with special needs has a written IEP/IFSP and is obtaining recommended services?
-  • (C) Listen during the Family Group Interview or question individual parents: Are observations concerning their child's development incorporated into the curriculum? Do ongoing assessments of the physical, social, emotional and cognitive needs of their child result in timely detection of health or developmental problems?
-  • (C) Interview teachers to learn how lesson plans are adapted and the physical environment customized to meet each child's needs and individual learning styles.
-  • (C) Interview parents (if available): How are you involved in the IEP/IFSP process? Are recommended services obtained? In what way has the program assisted in this effort?

Early Intervention: IEP/IFSP Services and Individualization
(Expanded Protocol) *continued*Observation:

- (C) Note during home visit and classroom observations ways in which activities are tailored to support the strengths and particular challenges, including medical needs, of each child.
- Observe whether teacher/child interactions respect the cultural background, linguistic practices and particular beliefs of that individual's immediate and extended family.



- (C) Observe evidence of classroom intervention and educational strategies that support the medical needs of a child or group of children. Has the EHS/HS program been individualized to meet a child's identified needs?

Early Intervention: IEP/IFSP Services and IndividualizationNotes:

Early Intervention: Emergency Procedures/Child Abuse & Neglect

How does the grantee ensure that:

Policies and procedures are established and implemented to respond to medical and dental health emergencies with which all staff are familiar and trained?

(1) Policies and plans of action for emergencies that require rapid staff response (choking) or immediate medical or dental attention are posted? 1304.22(a)(1)

(2) Locations and telephone numbers of emergency response systems are posted, and up-to-date family contact information and consent for emergency care is readily available? 1304.22(a)(2)

(3) Emergency evacuation routes are posted and safety procedures for emergencies (fire or weather-related) are practiced regularly? 1304.22(a)(3)

(4) Policies include methods of notifying parents in the event of an emergency involving their child? 1304.22(a)(4)

(5) Policies exist that define established methods for handling cases of suspected or known child abuse and neglect that are in compliance with applicable Federal, State or Tribal laws? 1304.22(a)(5)

- What program policies and practices ensure that prompt, effective response to emergencies occurs in all EHS/HS settings?
- How do staff learn about emergency preparedness? What measures assist staff in maintaining competence in order to respond calmly and confidently in an emergency?
- How are parents informed of emergency situations and what is their role?
- If a practice drill or actual emergency shows inadequate response, are actions taken to improve performance?
- What systems are in place to ensure identification of suspected child abuse and neglect and appropriate staff response?




Early Intervention: Emergency Procedures/Child Abuse & Neglect *continued*

	Suggested Sources	Actual Sources
Documents Reviewed	Service Plans/P&P Training records/HR files Health & Safety Checklist Child files (UTD contacts) Bus (contact information) Emergency drill logs	
Persons Interviewed	Teaching staff/volunteers Family Service Workers Bus Driver or Monitor Health Manager HSAC members	
Observed	Posted plans, emergency numbers & evacuation routes	

Notes:

Early Intervention: Emergency Procedures/Child Abuse & Neglect (Expanded Protocol)

Document Review:

- Review Service Plans and policies for comprehensive, clearly stated procedures for responding to medical and dental health emergencies.
- Review policies and procedures for detailed internal and external emergency plans, including response to weather-related disasters applicable to the region (i.e., hurricane preparedness for grantees located on the Florida coast). Are there clear provisions for the handling of children when closure of the center is necessary? Are accommodations made in standard evacuation procedures for children in wheelchairs or with significant physical disabilities?
-  • (C) Review training records to determine whether periodic instruction is provided to staff on health emergency procedures that are specific and age-appropriate. How do staff have opportunities to practice emergency drills? Do caregivers receive periodic training on recognizing signs and symptoms of child abuse/neglect and on reporting requirements as dictated by Federal, State or Tribal laws?
-  • (C) Review Human Resource files to determine whether staff CPR/First Aid training is current according to program policy.
-  • (H&S) Complete the Health & Safety Checklist for each facility visited and inquire further if concerns arise (see also Observation).

Review child files, classroom logs and bus records for up-to-date family contact information and authorization for emergency care. Note documentation of parent contact in response to an emergency or injury for thoroughness and for appropriate follow-up, when applicable.

- Review logs of periodic emergency practice drills, including unannounced evacuations, held in the center or home. In what way is information obtained during drills used to improve future response?
- Review Service Plans and program policies regarding established methods for handling cases of suspected or known child abuse/neglect, including clear confidentiality guidelines to protect individuals involved in reporting and the content of child files.

Early Intervention: Emergency Procedures/Child Abuse & Neglect (Expanded Protocol) *continued*

Interview:

- Interview Family Service Workers and Classroom staff: How would you respond to a child, with a documented egg allergy, that is suddenly wheezing, coughing, short of breath and anxious after eating a few bites of casserole served for lunch (or other emergency scenario)? What kinds of emergencies or patterns of injuries have you experienced at your center (or in the home setting)? What opportunity do parents have to learn emergency first aid and injury prevention principles? What procedures are used to identify potential child abuse or maltreatment (i.e., daily health checks)? Explain your role and response to an unexplained bruise on a child in your classroom or as noted during a home visit.
- Interview the Health Manager or HSAC members: In what way does the Health Services Advisory Committee guide the program in responding appropriately to emergencies and aftermath activities (parent contact; assessment of action taken)?
- Interview the Bus Driver or Bus Monitor (if available): In what ways are you prepared to handle emergencies during child transport?
- Interview the Health Manager or HSAC members: In what way does the Health Services Advisory Committee guide the program in responding appropriately to emergencies and aftermath activities (parent contact; assessment of action taken)?
- Interview the Bus Driver or Bus Monitor (if available): In what ways are you prepared to handle emergencies during child transport?

Observation:

- Observe whether policies and action plans needed for quick response are posted in locations at risk for emergencies (i.e., choking poster in classroom where children eat). Are evacuation routes posted?
- Observe whether telephone numbers for emergency response systems are clearly posted and if family contact information is complete, readily available and updated regularly. Is the poison control center number posted and do staff have quick access to a phone?
- Are EXIT signs in languages readily understood by children served?

Early Intervention: Emergency Procedures/Child Abuse & Neglect

Notes:

Early Intervention: Conditions of Short-Term Exclusion and Admittance

How does the grantee ensure that:

A child with a short-term injury (that cannot be readily accommodated) or contagious illness is temporarily excluded from participating in program activities or group experiences while risk to the health or safety of that child or others is present?

1304.22(b)(1)

Admission to the program is not denied to any child (or long-term exclusion of an enrolled child) solely on the basis of his or her health care needs or medication requirements unless reasonable accommodations cannot be made to reduce the health or safety risk of that child or others without fundamentally altering the nature of the program? 1304.22(b)(2)

Parents inform the program of any health or safety needs of their child and that appropriate staff are informed, according to the program's confidentiality policy, of needed accommodations? 1304.22(b)(3)





- What systems ensure that children are temporarily excluded from program activities when health or safety risks exist?
- What policies and procedures ensure that a child with health or medication needs is admitted to the program, if possible?
- What training is offered to staff pertaining to communicable diseases and chronic childhood conditions?
- How are parents involved in preventing spread of contagious illness or if their child has health or safety needs?
- How are communicable disease outbreaks handled and who is involved?

	Suggested Sources	Actual Sources
Documents Reviewed	Service Plans/P&P Training records HSAC minutes, if applicable Child files	
Persons Interviewed	Classroom staff Family Service Workers Parents Health Manager	
Observed	Classroom environment Health checks/assessments	

Notes:

Early Intervention: Conditions of Short-Term Exclusion and Admittance (Expanded Protocol)

Document Review:

- Review program material (Service Plans/Policies & Procedures) related to the prevention, recognition and management of communicable disease to determine whether policies are clear, up-to-date and guided by reputable sources of information (i.e., local public health authorities, American Academy of Pediatrics, Center for Disease Control & Prevention, and/or National Resource Center for Health & Safety in Child Care, etc)? Is a Blood-Borne Pathogens Exposure Policy available and consistent with national recommendations?
 -  • (C) Review the program's Inclusion/Exclusion Policy, Admission Policy and absentee records for evidence of discrimination or altered standards for children with health care needs or medication requirements. Is the policy clearly written? Do program procedures provide for distribution of the Exclusion for Illness Policy to families at time of enrollment?
 -  • (C) Review Service Plans and other applicable documentation to determine whether the program has adequate health policies and protocols related to the inclusion of children with chronic disease or with medication requirements. Is there evidence of sufficient staff training and monitoring to ensure the health and safety of special needs children?
 -  • (C) Review training records for evidence that education and/or resources pertaining to the spread of communicable diseases and implications for prevention and management in the childcare setting are offered to staff.
 - Review Health Services Advisory Committee (HSAC) minutes for recommendations related to the management of communicable diseases. Has the committee addressed local issues, i.e., the incidence of tuberculosis or recent outbreak of Hepatitis A and discussed implications for the program?
- Document Review:
-  • (F) Do child files or other program records show a clear description of each illness, response by staff, details of parent contact, disposition of the child (picked up from center, taken to a health care provider) and applicable follow-up (when the child can return, exposure notices, if indicated).

Interview:

- Interview classroom staff: What procedures are used to identify children with suspected contagious illness (i.e., daily health checks)? What actions are taken when a child arrives at your center with signs of illness (such as fever and rash)? How are parents notified about exposure to a diagnosed communicable disease?

Early Intervention: Conditions of Short-Term Exclusion and Admittance (Expanded Protocol) *continued*

- Interview Family Service Workers: What resources are available to you when questions about health concerns arise? How do you learn about vaccine preventable diseases and other communicable illnesses? What ways do you support families in avoiding infections and managing a child while sick?
- Interview parents: What happens if your child gets sick while attending the center? What is your understanding of the program's policy related to sick children? How were you informed about the Exclusion for Illness Policy? Have you had the opportunity to inform program staff of any health or safety needs of your child? Do staff demonstrate a respect and understanding of your health beliefs and practices?
- Interview the Health Manager: What role does the Health Services Advisory Committee (HSAC) or Health Consultant play in the prevention and management of communicable disease at your centers? Is attendance tracked and monitored for potential illness exposure concerns? How are community resources utilized when group health concerns arise? How are communicable diseases reported? Explain processes used to share sensitive health information among staff (listen for: "on a need-to-know basis while respecting confidentiality").

Observe:

- Observe whether classroom staff assess children upon arrival for evidence of illness (i.e., daily health check)? What actions are taken by staff to separate a child that becomes ill during the session from others in class? Does the child appear to be observed for other symptoms and monitored for worsening status?
- Observe whether posters or other resource information are available in classrooms on the prevention and management of communicable diseases in a Head Start or childcare setting.
- Notice whether fact sheets and public health notices are translated into language understood by families served.
- Observe whether appropriate equipment and adequate supplies are available at centers to perform necessary health procedures and accommodate a child's health or safety needs.

Early Intervention: Conditions of Short-Term Exclusion and Admittance

Notes:

Early Intervention: Medication Administration

How does the grantee ensure that:

Written procedures exist regarding the administration, handling, and storage of medication for every child that is consistent with Federal laws? 1304.22(c)

Procedures include:

(1) Labeling and storing, under lock and key, and refrigerating, if necessary, all medications, including those required for staff and volunteers; 1304.22(c)(1)

(2) Designating a trained staff member or school nurse to administer, handle and store child medications; 1304.22(c)(2)

(3) Obtaining physicians' instructions and written parent or guardian authorizations for all medications administered by staff; 1304.22(c)(3)

(4) Maintaining an individual record of all medication dispensed and reviewing the record regularly with the child's parents; 1304.22(c)(4)

(5) Recording changes in a child's behavior that have implications for drug dosage or type and assisting parents in communicating with their physician regarding the effect of the medication on the child; and 1304.22(c)(5)



(6) Ensuring that appropriate staff members can demonstrate proper techniques for administering, handling and storing medication, including the use of any necessary equipment to administer medication? 1304.22(c)(6)

- What procedures ensure that the administration, handling and storage of medicines are consistent with Federal Laws?
- How does the program ensure that the designated person responsible for child medications is qualified and follows established procedures?
- How are parents involved when medications are dispensed during program hours?
- What medication records are kept and what happens if a drug error occurs?

	Suggested Sources	Actual Sources
Documents Reviewed	Policies & Procedures Training records Medication records	
Persons Interviewed	Health Manager Designated person Parents	
Observed	Medication storage Drug labels & consents	

Early Intervention: Medication Administration (Expanded Protocol)

Document Review:

- Review program policies to ensure that written procedures exist regarding the administration, handling, and storage of medication.
-  • (C) Review training records to determine whether designated staff have been educated on procedures for administering and documenting medications.
- Review Health Services Advisory Committee (HSAC) minutes to determine whether guidance has been provided to the program on the administration, handling and storage of medication (if applicable).
-  • (F) Review medication records for instructions from a health care provider and for written parent consent. When medicine is given at the center, does documentation include the child's name, date and time of administration and name of person giving the drug along with any complications, errors or side effects that occurred?

Interview:

- Interview the Health Manager or classroom staff: Who dispenses and stores child medications at each site? What training has that individual received? What procedures are used for administering medications? How are doses and observations of child behavior recorded? What happens if a medication error occurs (wrong dose, wrong child)?
- Interview parents: At any time during the program year, has your child needed medicines to be given during the class day? If so, what arrangements were made to administer the drug (consents, prescriptions, and equipment needs, such as a nebulizer)? Are you aware of any problems related to medication administration, handling or storage at the center?

Observation:

- Observe whether medications are secure (locked) and properly stored in childproof containers in each center visited. Are drugs stored as directed (refrigerated or room temperature), unexpired and away from food? Are prescription medications in the original container and properly labeled with name of child, health care provider, drug, date of issuance and instructions on use?

Early Intervention: Medication Administration

Notes:

Early Intervention: First Aid Kits

How does the grantee ensure that:

Well-supplied, age-appropriate first aid kits are readily accessible to staff (but not children) at each facility and while off-site? 1304.22(f)(1)

First aid kits are restocked after use per regular inventory checks? 1304.22(f)(2)

- What procedures are in place to ensure that first aid kits are readily accessible and adequately supplied?
- How do staff know about program expectations related to first aid kits?
- Who monitors first aid kits?
- What is the process when supplies are needed or products are outdated?

	Suggested Sources	Actual Sources
Documents Reviewed	Policies & Procedures Training Records Inventory Checklists	
Persons Interviewed	Classroom staff Health Manager Bus Driver or Monitor	
Observed	First aid kits	

Notes:

Early Intervention: First Aid Kits (Expanded Protocol)Document Review:

- Review program materials for policies related to maintaining adequate, accessible first aid supplies in locations where children are present (classroom, playground, bus).
- Review procedures (inventory checklists), for ensuring that First Aid kits are restocked as needed.
- Review Training Records for evidence of CPR/First Aid instruction for all staff involved in the care of children. Do staff have periodic opportunities to practice the principles of basic first aid?

Interview:

- Interview Bus Driver/Monitor or applicable staff: Are first aid supplies available during group socializations and on field trips?

Interview classroom staff or the Health Manager: What staff members are responsible for conducting periodic inventories of first aid kits? What is the process when supplies are needed or products are outdated? Is there a system in place for the ongoing monitoring of first aid kits?

- Observe whether age-appropriate first aid kits and emergency contact information is accessible during class and when children are away from the center.
- Inspect the contents of first aid kits for adequate supplies relevant to program size and for inventory checks.

Observation:

- Observe whether first aid kits are out of reach of children.

Early Intervention: First Aid KitsNotes:

Managing Health Services: Tracking and Follow-up/Ongoing care

How does the grantee ensure that:

Provisions of all child health and developmental services are tracked and that follow-up services are received in a timely manner? 1304.20(a)(1)(ii)(C)

Follow-up plans are developed and implemented for identified conditions? 1304.20(a)(1)(iv)

Recommended preventive (fluoride supplements or topical fluoride, when indicated) and dental treatment are accomplished? 1304.20(c)(3)(i)&(ii)

Effective procedures exist to identify new or recurring medical, dental or developmental concerns to facilitate timely referrals and intervention? 1304.20(d)

Efficient and effective record-keeping systems exist to provide accurate and timely information regarding children, families and staff, and that confidentiality is ensured? 1304.51(g)

- What systems ensure accurate, timely and ongoing tracking of medical, dental or developmental concerns?
- When concerns are identified, what processes guarantee that recommended treatment and follow-up services are monitored until resolution?
- What training is provided to staff on the identification, tracking and recording of medical and dental conditions?
- How are families assisted in obtaining needed services for their child?
- What happens if a previously undetected health problem is suspected?

	Suggested Sources	Actual Sources
Documents Reviewed	Child files/tracking logs EPSDT schedule Training records Monitoring systems	
Persons Interviewed	Health Manager Center supervisors Teachers or Home Visitors Parents	
Observed	Security of files Child health status	

Notes:

Managing Health Services: Tracking and Follow-up/Ongoing Care (Expanded Protocol)

Document Review:



- (F) Review child files and tracking documents to determine whether medical and dental follow-up care is documented and monitored through resolution of the problem (treatment complete).
- Does the program have an effective way to track whether documentation exists in child/family files to demonstrate that medical/dental examinations, screenings and appropriate risk-assessment or testing has been accomplished according to the EPSDT periodicity schedule? How is this process monitored and by whom?
- Determine whether procedures are in place to track screening results, including a method for identifying children who need repeat testing and/or referral.

Review tracking logs or other program documents to determine whether an effective system exists for monitoring prenatal visits as recommended by the health care provider and to ensure that follow-up occurs when concerning risk factors are discovered during periodic assessments.

- Review training records: What training is provided to staff on the identification, tracking and recording of medical and dental conditions?

Interview:



- (C) Interview EHS/HS management (i.e., Health Manager) responsible for health services: What is used for tracking health services and how often are records updated? How are gaps found during tracking of examinations, required screens and follow-up addressed? What training is provided to staff that fail to ensure that required components occur within the specified timeframe and are adequately documented?



- (C) Interview the Health Manager and/or center supervisors to determine whether there is ongoing monitoring of EHS/HS child files to ensure appropriate immunization levels of enrolled children and adherence to the recommended schedule of well child visits, timely screenings and oral health encounters. Are center-specific or program-wide gaps identified and addressed?



- (C) Interview teaching staff or Family Service Workers: Describe what you would do if you observed a previously undetected health problem in a child. Who would you contact and how would the program ensure that the child received needed services?
- Interview parents: In what way has the program assisted you in obtaining needed services for your child?

**Managing Health Services: Tracking and Follow-up/Ongoing Care
(Expanded Protocol) *continued***Observation:

- Are observed practices related to the storage of health files and access to records (manual and computerized) consistent with recognized confidentiality standards? Are permission forms used to document parent consent for screenings and transfer of records? Are obvious breeches of confidentiality related to health care noted during site visits?
- Observe during visits to the classroom, home or during bus rides for evidence that staff note changes in a child's health status, appearance, behavior or skills. How do they respond to these changes?

Managing Health Services: Tracking and Follow-up/Ongoing careNotes:

Managing Health Services: Parent Involvement and Communication

How does the grantee ensure that:

Parents are immediately consulted when child health or developmental problems are suspected and actively participate in the process to ensure that their child has an ongoing source of health care and is receiving appropriate services? 1304.20(e)(1); 1304.20(e)(4)

Parents are familiarized with the use of and rationale behind health and developmental procedures administered through the program or by contract and provide authorization? 1304.20(e)(2)

Guidance is provided to parents on how to familiarize their children in a developmentally appropriate way prior to health procedures? 1304.20(e)(3)

Written documentation is maintained when a parent or other legally responsible adult refuses to give authorization for health services? 1304.20(e)(5)

Mechanisms are in place that supports communication among staff, parents, and community providers to assure follow-up services are received? 1304.51(c)






- What systems ensure timely parent contact when child health or developmental problems are suspected and promote ongoing communication regarding needed services and follow-up?
- How are staff informed about parental rights and involvement?
- What methods are used to communicate with parents and when?
- What ways do parents have to express concerns about the program? How effective are those processes and what happens to the information?

	Suggested Sources	Actual Sources
Documents Reviewed	Service Plans/P&P Child files Policy Council or Parent Committee minutes Training records	
Persons Interviewed	Program staff Parents	
Observed	Staff/parent interactions Communication sources	


Notes:

Managing Health Services: Parent Involvement and Communication (Expanded Protocol)

Document Review:

- Review Service Plans/Policies & Procedures for evidence that during initial contacts, families that have no medical home are assisted in enrolling in a system of ongoing health care.
-  • (F) Review child files to determine whether documentation of medical and dental homes, evidence of timely examinations and screening procedures, or written refusal for such services is available. In cases when parents elect not to obtain medical or dental services for their child, review efforts by program staff to explain benefits of care and support the family to access services, if indicated.
-  • (C) Review training records or other program documentation to ascertain whether parents are educated on health and developmental procedures to facilitate child participation, encourage preventive care and improve follow-up of identified needs. How are staff informed about parental rights and expected involvement?
-  • (C) Does review of Parent Committee Meeting and Policy Council minutes show discussion of challenges and/or recommendations related to accessing health and dental services?
-   • (C) (F) Review Service Plans and child files to determine whether effective systems exist for ongoing communication and partnership building among families of children with identified health needs and whether parents are involved as key partners in developing and implementing follow-up plans.

Interview

- Interview program staff and/or parents: What role do parents play in the screening process? In what way are parents shown how to familiarize their child with upcoming health procedures? How does the program work with parents to ensure follow-up of suspected abnormal screening results or for treatment of diagnosed medical problems? Is information on community resources that best meet the needs of the family shared and assistance provided by program staff in accessing those services when needed?
-  • (C) Listen during the Family Group Interview or when meeting with parents to determine whether they are familiar with health-related procedures and understand implications of test results. Are parents immediately consulted when child health or developmental problems are suspected?

Managing Health Services: Parent Involvement and Communication
(Expanded Protocol) *continued*

Observation:

- Observe staff interactions, informational postings, language used during presentations and interviews, etc. for evidence that parents are supported in being their child's primary caregiver and advocate.
- Is there evidence that information is shared with families (bulletin boards, flyers, newsletters) about health care services that are accessible and responsive to family needs?

Managing Health Services: Parent Involvement and Communication

Notes:

Managing Health Services: Community Partnerships

How does the grantee ensure that:

Active local planning and nurturing of community partnerships occurs for improving service delivery to children and families? 1304.41(a)(1)

Information is shared while preserving confidentiality standards? 1304.41(a)(1)

Affirmative steps are taken to establish ongoing collaborative relationships to ensure accessible and effective health, mental health, nutrition, disability and child protection services? 1304.41(a)(2)(i-vi)

A Health Services Advisory Committee, composed of EHS/HS parents, professionals and community volunteers, is established and maintained? 1304.41(b)

Recommendations of the Health Services Advisory Committee (HSAC) that are based on prevalent local community health problems are incorporated into the program's schedule for well child care? 1304.20(a)(1)(ii)

- What steps are taken to establish and maintain collaborative relationships to ensure accessible and comprehensive health and dental services?
- In what way do staff promote effective community partnerships?
How are community partners involved in program planning and activities?
- How are HSAC recommendations incorporated into the program's schedule for well child care and overall health operation?
- What practices ensure confidentiality of health information?

	Suggested Sources	Actual Sources
Documents Reviewed	Community Assessment Interagency agreements HSAC minutes Service Plans/P&P	
Persons Interviewed	Program staff Community Partners HSAC members Health Manager Family Service Workers	
Observed:	Staff/partner interactions Information boards	

Notes:

Managing Health Services: Community Partnerships (Expanded Protocol)

Document Review:



- (C) Review the most recent Community Assessment to learn about health related issues (high teen pregnancy rate; above average rate of low birth weight babies) affecting the population served. What has the program done to address these issues?



- (C) Review interagency agreements for community partnerships appropriate for identified local, regional or tribal needs. To what degree are collaborative relationships with the EHS/HS program reinforced through formal, written agreements?
- Review minutes of the Health Services Advisory Committee (HSAC) for guidance related to implementation of the Early Childhood Development and Health Services Written Plan and for recommendations on program or community issues affecting families served.
- Review program policies for staff guidance related to sharing privileged information to improve service delivery while honoring strict confidentiality standards.
- Review Service Plans for clearly defined procedures, including referral to appropriate professionals, when child abuse or neglect is suspected.

Interview



- (C) Listen during PRISM interviews and through discussions with individual staff for ways that access for children and families to needed health services has been strengthened through effective collaborations and program initiatives. Determine whether collaborative partnerships include providers that represent services consistent with the needs of EHS/HS families.
- Interview members of the Health Services Advisory Committee (HSAC) and/or available Community Partners about issues discussed and actions taken to address access issues or community challenges affecting EHS/HS families (i.e., access to dental treatment).
- Interview the Health Manager about ways in which the Health Services Advisory Committee (HSAC) is used to provide the program with professional expertise on medical, dental and mental health issues, and to expand linkages with local agencies.
- Interview Family Service Workers about their understanding of confidentiality and how it applies to their work with families.

Managing Health Services: Community Partnerships (Expanded Protocol)
*continued*Observation:

- (C) Observe, during the Community Partnership Interview, interaction of program staff and agency representatives for evidence of active alliances and effective collaborations with a wide range of organizations.
- Observe information boards for parent announcements on support services and prevention programs, including parenting classes, support groups, hotlines for crisis intervention, wellness activities, respite care, etc.

Managing Health Services: Community PartnershipsNotes:

Nutrition Services Protocol



(C) In collaboration with team members



(F) Focus child and family



(H&S) Included on Health & Safety Checklist

Prevention: Meeting Children's Nutritional Needs

How does the grantee ensure that:

Each child in a part-day center-based setting receives meals and snacks that provide at least 1/3 of the child's daily nutritional needs? 1304.23(b)(1)(ii)

Each child in a center-based full-day program receives meals and snacks that provide 1/2 to 2/3 of the child's daily nutritional needs, depending upon length of the program day? 1304.23(b)(1)(ii)

All children in morning center-based settings who have not received breakfast at the time they arrive at the Early Head Start or Head Start program are served a nourishing breakfast? 1304.23(b)(1)(iii)

Nutrition services are supported by staff or consultants who are registered dietitians or nutritionists? 1304.52(d)(3)




- What policies, procedures and plans support provision of nutritious meals and snacks for each enrolled child?
- How does the program ensure that a qualified person is responsible for the menu to ensure that meals and snacks meet appropriate levels of the child's daily nutritional needs?
- What guidance do cooks receive to support the preparation of safe, nourishing foods?
- In what way are parents involved in food choices or nutrition activities?

Prevention: Meeting Children's Nutritional Needs *continued*

	Suggested Sources	Actual Sources
Documents reviewed	Human Resource files Interagency agreements Training records Service Plans/P&P EHS/HS menus	
Persons Interviewed	Nutrition Manager Cooks Parents	
Observed	Meal service Posted menus	

Notes:

Prevention: Meeting Children's Nutritional Needs (Expanded Protocol)Document Review:

-  • (C) Review Human Resource files or Interagency Agreements to ensure that a Registered Dietitian (RD) or Nutritionist is employed by the program or available through contract to support nutrition services.
-  • (C) Review Service Plans or Policies & Procedures for evidence that a qualified person is responsible for the development and adjustment (substitutions) of the menu to ensure that meals and snacks meet appropriate levels of the child's daily nutritional needs (i.e., documentation of RD approval).
-  • (C) Review training records to ensure that food service personnel (cooks) have received appropriate education to support the preparation of safe, nourishing foods that meet each child's daily nutritional needs?
- Review policies, procedures and plans that support provision of nutritious meals and snacks for each enrolled child.
- Review Early Head Start and Head Start menus for evidence that foods are nutritious, varied and appropriate for the population served. Assess whether resources are available to applicable staff, such as guidelines for meal patterns of the USDA Child and Adult Care Food Program (CACFP), to ensure that the menu meets 1/3 to 1/2 of the child's daily nutritional needs depending on program option.

Interview

- Interview the Nutrition Manager or consultants responsible for development and/or approval of the menu regarding their qualifications and involvement in nutrition services. How does the program ensure that meals and snacks meet appropriate levels of the child's daily nutritional needs?
- Interview cooks: What practices ensure that food storage, preparation and delivery meet CACFP meal requirements for effective sanitation and good nutrition?
- Interview parents: In what way are you involved in the selection of foods used by the program or with nutrition activities?

Prevention: Meeting Children’s Nutritional Needs (Expanded Protocol)
continued

Observation:

- Observe whether breakfast is served to children in morning center-based centers visited. If not, do staff attempt to identify children that arrive without breakfast and provide food to adequately meet their dietary needs?
- Observe whether foods served to children attending center-based programs and group socializations are nutritious and developmentally appropriate.
- Observe whether a current menu is posted in food preparation areas and is available for caregivers and parents.

Prevention: Meeting Children’s Nutritional Needs

Notes:

Prevention: Dental Hygiene

How does the grantee ensure that:

Staff promote effective dental hygiene among children in conjunction with meals?
1304.23(b)(3)

Recommended preventive care (fluoride supplements or topical fluoride, when indicated) and dental treatment are accomplished? 1304.20(c)(3)(i)&(ii)

- What policies and procedures ensure that effective dental hygiene among children is promoted by staff in conjunction with meals?
- What systems ensure that preventive care and dental treatment is accomplished?
- What training do staff obtain related to prevention of early childhood caries and proper dental hygiene?
- How do children and parents learn ways to reduce risks for dental problems?
- What resources are available in the community for preventive care and dental treatment?

	Suggested Sources	Actual Sources
Documents reviewed	Policies & Procedures Classroom schedule Training records Parent meeting minutes Newsletters (if applicable) HSAC minutes Resource Directory	
Persons Interviewed	HSAC members Health or Nutrition Manager Family Service Workers Classroom staff Parents	
Observed	Dental hygiene Toothbrush storage	

Notes:

Prevention: Dental Hygiene (Expanded Protocol)

Document Review:

- Review policies and procedures related to dental hygiene for Early Head Start/Head Start children.



- (H&S) Review daily classroom schedule for inclusion of effective dental hygiene in conjunction with meals (tooth brushing).

Review the most recent Community Resource Directory for availability of dental providers within the program service area that care for EHS/HS families.



- (C) Review training records, Parent Committee meeting minutes or other program documents (i.e., newsletters) for education to staff and/or parents on prevention of early childhood caries and proper dental hygiene.
- Review Health Services Advisory Committee (HSAC) minutes for discussions and recommendations related to promotion of good oral health among children and their families, if identified as a need in the Community Assessment.

Interview

- Interview Health Services Advisory Committee (HSAC) members about dental resources within the community and access to these services by the Early Head Start/Head Start population. Assess their support to the program in promoting effective oral hygiene practices in the classroom and family home.
- Interview health/nutrition services staff or Family Service Workers about parent education related to the importance of preventive care, including fluoride supplements (if indicated) and dental sealants, if consistent with program policy and HSAC recommendations. Are these services available in the community and accessible (availability of transportation or interpretation services, if needed).
- Interview classroom staff about dental hygiene practices used daily in the classroom and educational strategies for children and parents aimed at reducing risk factors for tooth decay.
- Interview parents about their knowledge about prevention of early childhood caries (not putting a child to bed with a bottle, reduce frequent sugar consumption, tooth brushing, etc) and ways that the program has assisted them with this understanding.

Prevention: Dental Hygiene (Expanded Protocol) *continued*Observation:

- (H&S) Observe whether children practice effective dental hygiene that is appropriate for the age and developmental level of children present in conjunction with meals. Is oral care practiced among infants enrolled in Early Head Start, i.e. using gauze until toothbrush use is indicated?
- Observe the manner in which toothbrushes are stored to maintain cleanliness and avoid contamination.

Prevention: Dental HygieneNotes:

Prevention: Food Safety and Sanitation

How does the grantee ensure that:

All applicable Federal, State, Tribal and local food safety and sanitation laws, including those related to the storage, preparation and service of food and the health of food handlers, are met and evidence indicating compliance is posted? 1304.23(e)(1)

Contracts include only food service vendors that are licensed in accordance with State, Tribal or local laws? 1304.23(e)(1)


Facilities are available for the proper storage and handling of breast milk and formula? 1304.23(e)(2)

- What systems ensure compliance with food safety and sanitation standards?
- How do cooks learn appropriate food storage, preparation and service?
- What kitchen practices promote safe and sanitary food storage and preparation?
- What actions are taken if an issue is identified during a state inspection? Who is involved and what follow-up occurs, if indicated?



	Suggested Sources	Actual Sources
Documents reviewed	Local/state inspection reports Monitoring records Policies & Procedures	
Persons Interviewed	Health or Nutrition Manager Cooks	
Observed	Posted inspections Kitchen practices Meal service Center environment	

Notes:

Prevention: Food Safety and Sanitation (Expanded Protocol)Document Review:

- Review recent local and/or state inspection reports of facilities visited for compliance with food safety and sanitation measures. Obtain evidence showing follow-up of identified deficiencies, if applicable.
-  • (C) Review on-going monitoring documentation of self-inspections to ensure maintenance of food sanitation standards. Assess whether follow-up of identified problems has occurred, if applicable.
- Review policies and procedures related to food safety and sanitation. What provisions are in place to ensure that staff with signs or symptoms of illness do not handle food?




Interview

-  • (C) Interview Health/Nutrition Services staff about procedures for monitoring compliance with food sanitation standards and follow-up of self-assessment results and inspection reports.
-  • (C) Interview program staff about procedures to ensure that food service vendors/contractors, if used by the program, meet State, Tribal or local regulations.
- Interview cooks about measures taken to ensure safe food storage, preparation and service, including during transport.

Observation:

- Observe whether evidence is posted in centers visited of compliance with Federal, State, Tribal and local food safety and sanitation laws.
- Observe whether proper hand washing, use of gloves, hair protection and other evidence of sanitary hygiene (i.e., clean nails and clothing) occurs in conjunction with food preparation.
- Observe whether food safety practices, i.e. evidence of temperature logs and working thermometers, washing of fresh fruits and vegetables, and appropriate storage routines are in place if required by state regulations.
- Observe whether kitchen safety practices show evidence of a sanitary, well-organized environment if required by state regulations. Is a three-compartment sink (or equivalent arrangement) or an approved dishwasher available to ensure sanitation of dishes and pans used for food preparation?

Prevention: Food Safety and Sanitation (Expanded Protocol) *continued*Observation:

- Observe whether leftover food on individual plates or in family-style containers is discarded because of contamination risk.
-  • (H&S) Observe whether facilities are available for the proper storage and handling of breast milk and formula.
-  • (H&S) Observe whether garbage and trash are stored and disposed of in a safe, sanitary manner.
-  • (H&S) Observe whether indoor premises, including the kitchen and area where meals are served, are cleaned daily and kept free of undesirable and hazardous materials and conditions.

Prevention: Food Safety and SanitationNotes:

Early Intervention: Identification of Nutritional Needs

How does the grantee ensure that:

Staff and families work together to identify each child's nutritional needs, taking into account staff and family discussions concerning:

(1) Any relevant nutrition-related assessment data (height, weight, hemoglobin/hematocrit)? 1304.23(a)(1)

(2) Information about family eating patterns, including cultural preferences, special dietary requirements for each child with nutrition-related health problems, and the feeding requirements of infants, toddlers and each child with disabilities? 1304.23(a)(2)

(3) Infant and toddler feeding schedules, amounts and types of food provided, meal patterns, new foods, food intolerances and preferences, voiding patterns and observations related to developmental changes in feeding and nutrition? This information must be shared with parents and updated regularly. 1304.23(a)(3)

(4) Information about major community nutritional issues, as identified through the Community Assessment, the Health Services Advisory Committee or local health department? 1304.23(a)(4)






- What systems are in place to identify each child's nutritional needs? Who is involved in that process?
- How is relevant nutrition-related assessment data (height, weight, hemoglobin/hematocrit) obtained? What is done with that information?
- How do staff learn the normal ranges for nutrition-related assessment data? In what way are parents involved in identifying their child's nutritional needs?
- What happens when a child is overweight for height or has a low hemoglobin/hematocrit?

	Suggested Sources	Actual Sources
Documents reviewed	Child files/tracking logs Service Plans/P&P HSAC minutes Interagency agreements Training records	
Persons Interviewed	Health/nutrition staff Family Service Workers Parents	
Observed	Meal service Special dietary requirements	

Notes:

Early Intervention: Identification of Nutritional Needs (Expanded Protocol)

Document Review:

-  • (C) Review policies or program plans that define procedures for identifying each child's nutritional needs and ensuring periodic reassessment, particularly to meet the changing feeding requirements of infants, toddlers and children with disabilities.
- Review Health Services Advisory Committee (HSAC) minutes for recommendations related to acquisition of hemoglobin/hematocrit values and information about program or community nutritional issues, if applicable.
-  • (C) Review interagency agreements (i.e., WIC), if available, and parent consents on provisions for sharing nutrition-related assessment data (height, weight, lead, hemoglobin/hematocrit).
-  • (F) Review child files for evidence that information was obtained from the parent, legal guardian or health care provider on specific nutrition and feeding needs (i.e., nutrition history or assessment). Note whether written instruction on dietary modification or special feeding techniques obtained from the parent or health care provider is available, if indicated.
-  • (F) Review child files for documentation of nutrition-related assessment data, including height, weight, and hemoglobin/hematocrit. Review tracking tools and charts used to identify growth patterns or abnormal laboratory values requiring follow-up.
-  • (C) Review training records to identify how staff learns about normal ranges for nutrition-related information.

Interview

- Interview Health/Nutrition Services or Family Service Workers about practices for obtaining nutrition-related assessment data, including height, weight and hemoglobin/hematocrit for each child. What is their understanding of this information? How do they use the assessment data to benefit the child?
- Interview program staff responsible for health and nutrition regarding procedures for identifying assessment values that are outside the normal range, i.e., overweight for height, low hematocrit for age. What services are provided to children and families when potential problems are identified? How are responses to issues documented and tracked to ensure follow-up until resolution?

Early Intervention: Identification of Nutritional Needs (Expanded Protocol) *continued*

- Interview parents about ways in which staff work with them to identify their child's nutritional needs, including family eating patterns, cultural preferences and special feeding requirements. In what manner and how often is information shared with parents of infants and toddlers regarding feeding schedules, eating behaviors and voiding patterns?

Observation:

- (C) Observe whether children with special dietary needs or disabilities are receiving assistance needed to meet their feeding requirements.
- Observe whether written information on the special needs/dietary modifications is available for kitchen and classroom staff.

Early Intervention: Identification of Nutritional Needs**Notes:**

Early Intervention: Appropriate Foods

How does the grantee ensure that:

Each infant and toddler in center-based settings receives food appropriate to his or her nutritional needs, developmental readiness and feeding skills, as recommended in the USDA meal pattern or nutrient standard menu planning requirements? 1304.23(b)(1)(iv)

For 3-5 year olds, the quantity and kinds of food served conforms to recommended serving sizes and minimum standards for meal patterns recommended in the USDA meal pattern or nutrient standard menu planning requirements? 1304.23(b)(1)(v)

For 3-5 year olds in center-based settings or other Head Start group experiences, foods served are high in nutrients and low in fat, sugar and salt? 1304.23(b)(1)(vi)

- How does the program ensure that meals meet the requirements of the CACFP?
- Who determines what foods are served (menu composition)?
- How does the program ensure that food served to infants and toddlers is developmentally appropriate?
- How do parents learn about appropriate serving sizes and food choices?
- Are foods served that pose risk of choking? Are action plans for choking emergencies posted for rapid staff response?

	Suggested Sources	Actual Sources
Documents reviewed	Policies & procedures Menus Job descriptions or contracts	
Persons Interviewed	Center or home-based staff Parents Cooks RD or Nutritionist	
Observed	Food/formula served Posted emergency plans	

Notes:

Early Intervention: Appropriate Foods (Expanded Protocol)Document Review:

- Review policies and procedures requiring that meals, including storage, preparation and service, meet requirements of the child care component of the U.S. Department of Agriculture (USDA), Child and Adult Care Food Program (CACFP).
- Review menus to confirm that the quantity and kinds of food served conforms to recommended serving sizes and minimum standards. Substantiate that menus reflect food appropriate for the nutrient needs, developmental readiness and feeding skills of toddlers and preschool children.
- Review applicable job descriptions and/or contracts to substantiate that a qualified person is responsible for menu composition, including modifications.
- Review menus to confirm the absence of foods that pose risk of choking and items that are high in fat, sugar or salt.

Interview

- Interview agency and home based staff to explore ways in which CACFP infant and toddler meal patterns or other recognized standards are used to educate parents on appropriate serving sizes and food choices to offer in the home. Question parents, if available, about how and to what extent this information is provided.
- Interview food service personnel and caregivers about procedures used to ensure that infants and toddlers receive food appropriate for their individual nutrition requirements and developmental readiness.
- If available, interview the nutrition professional (i.e. Registered Dietitian or Nutritionist) used by the program to approve menus, including those that accommodate needed dietary modifications. What support is provided to the program regarding dietary modifications for individual children and to ensure appropriate food substitutions?

Observation:

- Observe whether food served in center-based settings is appropriate to the nutritional needs, developmental readiness and feeding skills of enrolled children.
- Observe whether meals and snacks include foods that avoid choking risks and are high in nutrients and low in fat, sugar and salt.

Early Intervention: Appropriate Foods (Expanded Protocol) *continued*



- (H&S) Observe whether policies and plans of action for emergencies that require rapid response on the part of staff (such as a child choking) or immediate medical or dental attention are clearly posted.

Early Intervention: Appropriate Foods

Notes:

Early Intervention: Scheduling Meal Times; Feeding on Demand

How does the grantee ensure that:

Meal and snack periods in center-based settings are appropriately scheduled and adjusted, when necessary, to ensure that individual needs are met? 1304.23(b)(1)(vii)

Infants and young toddlers are fed “on demand” to the extent possible or at appropriate Intervals? 1304.23(b)(1)(vii)

- What policies and plans guide staff on the scheduling of meals and snacks?
- How do staff learn about the feeding needs of infants and toddlers?
- What communication with parents occurs to support the individual needs of young children?

	Suggested Sources	Actual Sources
Documents reviewed	Policies and plans Menus Classroom schedules	
Persons Interviewed	Teachers/caregivers Parents Nutrition Manager	
Observed	Demand feeding of infants Young toddler meals/snacks	

Notes:

Early Intervention: Scheduling Meal Times; Feeding on Demand (Expanded Protocol)

Document Review:

- Review policies and health/nutrition service plans for guidance on the scheduling of meals and snacks. Is information provided about demand feeding for infants?
- Review menus or classroom schedules for the appropriate number of meals and snacks in center-based classes based on CACFP guidelines.

Interview

- Interview the Nutrition Manager, teachers or caregivers about how the nutritional and nurturing needs of individual children are met.
- Interview parents on whether the feeding needs of their infants or toddlers are accommodated by the Early Head Start program. What communication with program staff occurs and how often?

Observation

- Observe whether infants are being fed on demand and if young toddlers are provided food at reasonable intervals.

Early Intervention: Scheduling Meal Times; Feeding on Demand

Notes:

Managing Nutrition Services: Program Design and Implementation

How does the grantee ensure that:

The design and implementation of the nutrition program meets the nutritional needs and feeding requirements of each child, including those with special dietary needs and children with disabilities? 1304.23(b)(1)

The nutrition program serves a variety of foods which consider cultural and ethnic preferences and which broaden the child's food experience? 1304.23(b)(1)

Home-based program options provide appropriate snacks and meals to each child during group socialization activities? 1304.23(b)(2)

Parents and appropriate community agencies are involved in planning, implementing and evaluating the agencies' nutritional services? 1304.23(b)(4)





- Are nutrition-related issues identified on the most recent Community Assessment? How is this information used by the program?
- Is a variety of foods offered which take into account the cultural and ethnic preferences of families served?
- How are parents and community partners involved in nutrition services?
- How does the program accommodate children with special dietary needs or feeding requirements?
- Did the program's Self Assessment address Nutrition Services? Were significant strengths and concerns identified? What change occurred if significant issues were recognized?

	Suggested Sources	Actual Sources
Documents reviewed	Community Assessment Menus Child files Monitoring tools Self Assessment	
Persons Interviewed	Nutrition Manager RD or Nutritionist HSAC members or Community Partners (if available) Parents	
Observed	Center-based meal service Socialization meals or snacks	



Notes:

Managing Nutrition Services: Program Design and Implementation (Expanded Protocol)

Document Review:

-  • (C) Review whether the most recent Community Assessment identifies nutrition-related needs of the population served (i.e., elevated blood lead levels, incidence of childhood obesity). How is this information incorporated into the design and implementation of the program?
-  • (F) Review menus and child files for evidence that information from nutrition assessments reflects the needs of each individual child. Are foods reflective of cultural and racial groups serviced by the agency?
-  • (C) Review monitoring tools and strategies used by the program to assess whether compliance is achieved in the areas of nutrition and food service. Note whether documentation of follow-up exists for identified issues.
-  • (C) Review the most recent Self Assessment for content addressing Nutrition Services. Were significant strengths and concerns identified? What change occurred if significant issues were recognized?

Interview

- Interview staff about the types of food learning experiences that are offered in the classroom and home settings.
-  • (C) Interview management staff responsible for nutrition services: Describe practices related to the ongoing monitoring of food storage, preparation and delivery. What change occurred as a result of problems identified during ongoing monitoring?
- Interview nutrition professionals (RD or Nutritionist) and/or program staff about how foods are responsive to cultural and ethnic groups represented in the program. What assistance is provided to the program regarding menu modifications for children with special dietary needs and for children with disabilities?
- Interview Health Services Advisory Committee (HSAC) members or other Community Partners: What key nutrition issues exist in communities served by the program? What assistance is available in the community to address nutrition-related problems? Are community resources (i.e., WIC) used by the program for the benefit of families served?
-  • (C) Listen during the Family Focus Group about whether the program meets the medical and dietary needs of children served. Interview parents about ways in which they are involved in the planning, implementing and evaluating of nutrition services.

Managing Nutrition Services: Program Design and Implementation
(Expanded Protocol) *continued*Observation:

- Observe whether meals meet the nutritional needs and feeding requirements of each child, including those with special dietary needs and children with disabilities.
- Observe whether meals or snacks are provided during group socializations.
- Observe whether menus are posted in prominent locations, showing all foods to be served during the month and that this information is made available to parents.

Managing Nutrition Services: Program Design and ImplementationNotes:

Managing Nutrition Services: Meal Service

How does the grantee ensure that:

Nutritional services in center-based settings contribute to the development and socialization of enrolled children by providing that:

- (1) A variety of food is served which broadens each child's food experiences?
1304.23 (c)(1)
- (2) Food is not used as punishment or reward and that each child is encouraged, but not forced, to eat or taste food? 1304.23(c)(2)
- (3) Sufficient time is allowed for each child to eat? 1304.23(c)(3)
- (4) All toddlers and preschool children and assigned classroom staff, including volunteers, eat together family style and share the same menu to the extent possible? 1304.23(c)(4)
- (5) Infants are held while being fed and are not laid down to sleep with a bottle?
1304.23(c)(5)
- (6) Medically-based diets or other dietary requirements are accommodated?
1304.23(c) (6)
- (7) Opportunity is provided for the involvement of children, as developmentally appropriate, in food-related activities? 1304.23(c)(7)

- What systems are in place to ensure that family-style meals are appropriately scheduled and managed?
- How are new foods introduced to infants and toddlers? What is the parent's role in that process? Are infants held while fed?
- How are families involved in food related activities?
- Are children allowed to make food choices, including quantity, based on individual appetites and preferences? How are positive attitudes fostered?
- How are special dietary needs and feeding requirements accommodated?

Managing Nutrition Services: Meal Service *continued*

	Suggested Sources	Actual Sources
Documents reviewed	Service Plans/P&P Menus Classroom schedules	
Persons Interviewed	Nutrition Manager Classroom staff Family Service Workers Parents	
Observed	Infant feedings Meal service	

Notes:

Managing Nutrition Services: Meal Service (Expanded Protocol)

Document Review:

- Review service plans and policies regarding food service, including requirements for family-style meals that include staff and volunteers. Note whether appropriate procedures exist for the feeding of infants and young toddlers.
- Review menus to confirm that a variety of foods are served for toddlers and preschoolers.
- Review classroom schedules to note whether sufficient time is scheduled for food service.

Interview

- Interview the Nutrition Manager, classroom staff or parents about procedures related to the introduction of new foods to infants and toddlers. How are special diets and feeding needs accommodated while still contributing to a positive learning experience for affected children?
- Interview classroom staff or Family Service Workers about methods used to promote positive attitudes among children regarding healthy eating practices. In what way are children involved, as developmentally appropriate, in food-related activities? Are families involved in food preparation or meal time activities at the program? How are good nutrition and sanitation practices transferred to the home setting?

Observation:

- Observe whether a variety of age appropriate foods are served to broaden each child's learning experience.

Observe whether developmentally appropriate seating and utensils are used during meals.

- Observe whether children are allowed to make food choices, including quantity, based on individual appetites and preferences. Note that food is not used as punishment or reward and whether each child is encouraged, but not forced, to eat.
- Observe whether sufficient time is allowed for each child to eat.
- Observe whether staff and volunteers eat with children in a family-style setting and share the same foods, when possible. How are they interacting with the children?

Managing Nutrition Services: Meal Service (Expanded Protocol) *continued*

- Observe whether staff and volunteers model appropriate meal time behavior and use opportunities during conversations at the table to develop positive attitudes among children toward healthy foods.
- Observe whether infants attending Early Head Start sessions are held while fed and if the classroom environment is positive.
- If applicable in centers visited, observe whether medically-based diets or other dietary requirements are accommodated.
- Observe whether kitchen safety practices show evidence of a sanitary, well-organized environment if required by state regulations. Is a three-compartment sink (or equivalent arrangement) or an approved dishwasher available to ensure sanitation of dishes and pans used for food preparation?

Managing Nutrition Services: Meal Service

Notes:

Disabilities Services Protocols

How does the grantee ensure that:

Its program is designed and managed to make at least ten percent of their enrollment opportunities available to children with disabilities and support the effective inclusion of these children and their families in the full range of program activities?

Its services to children with disabilities and their families are well coordinated with community partners, particularly the local education agencies (LEAs) and Part C agencies responsible for implementing the Individuals with Disabilities Education Act?

The need for any early intervention, special education, and/or related services is identified promptly and in coordination with the Part C agency and/or LEA?

Children determined to have disabilities receive special education and related services needed through implementation of an IEP/IFSP?

Parents of children with disabilities are supported and involved as decision-makers and receive information and assistance in understanding and advocating for services and support needed to address their child's special needs?

1. Program Planning and Management for Quality Disabilities Services:

How does the grantee ensure that its program is designed and managed to make at least ten percent of their enrollment opportunities available to children with disabilities and support the effective inclusion of these children and their families in the full range of program activities?

1.A) Is there an up-to-date written plan for the program's disabilities services? Have parents and community partners contributed to this plan?

1.B) Are program management, policy groups, and governing body involved in assuring that resources are allocated to address needs of children with disabilities? Does the budget reflect this support?

1.C) Does the program have and implement procedures for recruitment, selection, and enrollment that assures at least 10% of enrollment opportunities are made available to children with disabilities, including children with more significant disabilities?

1.D) Is the program managed in a way that supports implementation of quality disabilities services? Were disabilities services examined in the program's self-assessment and were any identified concerns addressed?

1.E) Does program implement procedures to ensure that its practices and facilities meet requirements of Sect. 504 of Rehab Act and Americans with Disabilities Act (ADA)? Has it made alterations/accommodations needed to enable participation of persons with disabilities in the program (including parents, staff, and community members)?

1.A) Is there an up-to-date written plan for the program's disabilities services? Have parents and community partners contributed to this plan?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Disabilities services plan:</u></p> <ul style="list-style-type: none"> • Does the plan include information regarding local needs and resources in disabilities services? • Has the document been updated annually? <p><u>Policy Council documents:</u> Have policy groups reviewed and approved the plan annually?</p>	
Persons Interviewed	<p><u>Program Director and Disabilities Services Coordinator:</u></p> <ul style="list-style-type: none"> • How were local stakeholders involved in the planning process? How and when was this plan updated? • What plan features do you regard as most important in promoting inclusion of children with disabilities? <p><u>Parents of Children with Disabilities:</u></p> <ul style="list-style-type: none"> • Did parents review and provide input on the program's plan for disabilities services? • Does this program plan ahead in order to be well prepared to include children with disabilities and their families? <p><u>Community Partners:</u> Has program worked with you to identify local needs and resources? Have you reviewed and provided input to their plan?</p>	
Program Services Observed		

Relevant regulations:

1304.51(a)(1)(iii) The development of written plan(s) for implementing services in each of the program areas...

1304.51(a)(2) All written plans... reviewed and approved by the Policy Council or Policy Committee at least annually, and must be revised and updated as needed.

Following regs from 1308 apply only to programs serving preschool age children

1308.4(a) ...must develop a disabilities service plan providing strategies for meeting the special needs of children with disabilities and their parents. The purposes of this plan are to assure--all components of Head Start are appropriately involved in the integration of children with disabilities and their parents; and

(b).... plan must be updated annually.

(c) The plan must include provisions for children with disabilities to be included in the full range of activities and services normally provided to all Head Start children and provisions for any modifications necessary to meet the special needs of the children with disabilities.

1308.4(d) The Head Start grantee and delegate agency must use the disabilities service plan as a working document which guides all aspects of the agency's effort to serve children with disabilities...(1308.4. e- o describes plan features).

1.B) Are program management, policy groups, and governing body involved in assuring that resources are allocated to address needs of children with disabilities? Does the budget reflect this support?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Program Budget:</u></p> <ul style="list-style-type: none"> • How are resources allocated to implement activities in the disabilities services plan? • Has the Disabilities Services Coordinator worked with Director to develop budget that supports disabilities services? <p><u>Policy Council Proceedings:</u> Has policy group engaged in reviewing the allocation of resources that support disabilities services?</p>	
Persons Interviewed	<p><u>Program Director:</u></p> <ul style="list-style-type: none"> • How has the Policy Council been involved in issues affecting allocation of resources for disabilities services? • How is Disabilities Services Coordinator included in planning and budgeting? What are procedures for updating disabilities services plan and corresponding budget annually? <p><u>Policy Council/Committee:</u> What information does the policy group use in allocating resources to assure quality services for children with disabilities and their families?</p>	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<u>Disabilities Services Coordinator:</u> How do you work with the Director and policy groups to assure resources are allocated to address needs of children with disabilities? Discuss a recent example in detail.	
Program Services Observed	<u>General Program Observation:</u> Are services, materials, and equipment supporting disabilities services being provided as described in budget plans?	

Relevant regulations:

1304.51(a)(1)(ii) The formulation of both multi-year (long-range) program goals and short-term program and financial objectives that address the findings of the Community Assessment...and reflect the findings of the program's annual self-assessment; and

1304.51(a)(2) All written plans for implementing services, and the progress in meeting them, must be reviewed by the grantee or delegate agency staff and reviewed and approved by the Policy Council or Policy Committee at least annually, and must be revised and updated as needed.

The following regs from 1308 apply only to programs serving preschool age children:

1308.4(e) ...designate a coordinator of services for children with disabilities (disabilities coordinator) and arrange for preparation of the disabilities service plan and of the grantee application budget line items for services for children with disabilities... must ensure that all relevant coordinators, other staff and parents are consulted.

1308.4(m) The disabilities coordinator must work with the director in planning and budgeting of grantee funds to assure that the special needs identified in the IEP are fully met; that children most in need of an integrated placement and of special assistance are served; and that the grantee maintains the level of fiscal support to children with disabilities consistent with the Congressional mandate to meet their special needs.

1308.4(n) The grant application budget ...must reflect requests for adequate resources to implement the objectives and activities in the disability services plan and fulfill the requirements of these Performance Standards.

1308.4(o) The budget request included with the application for funding must address the implementation of the disabilities service plan. Allowable expenditures include: ...

1.C) Does the program have and implement procedures for recruitment, selection, and enrollment that assure at least 10% of enrollment opportunities are made available to children with disabilities, including children with more significant disabilities?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Attendance Records/PIR:</u> Review data on children with disabilities in the program. How many children with disabilities are served now? What percentage of funded enrollment is that? (If below 10%, review prior year data; is program addressing this?)</p> <p><u>Recruitment/Selection Plan:</u> Is there a systematic approach to recruit, select, and enroll those children with disabilities who are most in need of services?</p> <p><u>Recruitment materials:</u> Do materials include priority of enrolling children with disabilities? Are materials disseminated in a way planned to reach families of children with disabilities?</p> <p><u>Community assessments:</u> How was information on needs of local children with disabilities and resources from community partners used to plan disabilities services?</p>	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<p><u>Recruitment Lead Staff:</u></p> <ul style="list-style-type: none"> • Describe procedures you follow to assure at least 10% of enrollment opportunities are for children with disabilities. • How are recruiters trained/supervised to prevent discrimination based on level/type of disability? <p><u>Disabilities Services Coordinator:</u> What percentage of current enrollment are children with disabilities? If below 10%, what is program doing to address this? Describe your role in recruitment and selection.</p> <p><u>LEA/Part C Partners:</u></p> <ul style="list-style-type: none"> • Does this program coordinate with you in its recruitment and enrollment of children with disabilities? Do they make efforts to include children with previously identified disabilities? • Does the program include children with more significant disabilities? If they do not, why do believe this is so? 	

<i>continued from previous page</i>	Sources	Reviewer Notes
Program Services Observed	<u>Recruitment activities/displays:</u> Are there activities/displays that welcome applications from families of children with disabilities? <u>Program Operations:</u> Are there program features that discourage enrollment of children with disabilities?	

Relevant regulations:

1305.6(c) At least 10 percent of the total number of enrollment opportunities in each grantee and each delegate agency during an enrollment year must be made available to children with disabilities who meet the definition for children with disabilities in Sec. 1305.2(a).

An exception to this requirement will be granted only if the responsible HHS official determines, based on such supporting evidence as he or she may require, that the grantee made a reasonable effort to comply with this requirement but was unable to do so...

1305.3(c) Each Early Head Start and Head Start grantee agency must conduct a Community Assessment within its service area once every three years. The Community Assessment must include the collection and analysis of the following information about the grantee's Early Head Start or Head Start area: ... 3) The estimated number of children with disabilities four years old or younger, including types of disabilities and relevant services and resources provided to these children by community agencies

Following regs from 1308 apply only to programs serving preschool age children

1308.5(a) The grantee or delegate agency outreach and recruitment activities must incorporate specific actions to actively locate and recruit children with disabilities. (See also 1308.5(f) ... recruiting children who have severe disabilities, including children who have been previously identified as having disabilities.

1308.5(b) A grantee must insure that staff engaged in recruitment and enrollment of children are knowledgeable about the provisions of 45 CFR part 84, Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance, and of the Americans with Disabilities Act of 1990, (42 U.S.C. 12101).

1.D) Is the program managed in a way that supports implementation of quality disabilities services? Were disabilities services examined in the program's self-assessment and were any identified concerns addressed?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Self-Assessment:</u></p> <ul style="list-style-type: none"> • Is information regarding disabilities services included in the self-assessment? • Were concerns identified? If so, how were they addressed? <p><u>Position Description for Disabilities Services Coordinator:</u> Are qualifications and responsibilities appropriate? Does position require training and experience individualizing and securing services for children with disabilities?</p> <p><u>Budget:</u> Have resources been allocated to support management of quality disabilities services, including any concerns identified in the self-assessment?</p> <p><u>Consultant contracts for disabilities services:</u> What kinds of consulting services have been acquired? How do these services address program objectives for disabilities services?</p> <p><u>Staffing/Supervision Plans:</u></p> <ul style="list-style-type: none"> • Is the supervisory/staffing structure for disabilities services adequate to accomplish program goals and objectives? • What are the procedures/plans for training and supervising staff on serving children with disabilities and their families? Are responsibilities clearly described? 	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<p><u>Program Director/Managers:</u></p> <ul style="list-style-type: none"> • What were major findings of self-assessment for disabilities services? How did these findings affect your planning and management in disabilities services? • Describe how your program's training and supervision of staff supports quality disabilities services. <p><u>Disabilities Services Coordinator:</u> How do you work with other managers to coordinate efforts to support and supervise staff in implementing disabilities services?</p> <p><u>Staff:</u></p> <ul style="list-style-type: none"> • Were you involved in your program's self-assessment of disabilities services? • Do you receive the support/supervision and training you need to effectively include children with disabilities? • Describe areas where staff need the most support in serving children with disabilities and their families in your program. 	
Program Services Offered	<p><u>Program Operations:</u> Are staff receiving support/supervision to serve children with disabilities?</p>	

Relevant regulations:

1304.51(i)(1) At least once each program year, with the consultation and participation of the policy groups and, as appropriate, other community members, grantee and delegate agencies must conduct a self-assessment of their effectiveness and progress in meeting program goals and objectives and in implementing Federal regulations.

1304.52(a)(1) Grantee and delegate agencies must establish and maintain an organizational structure that supports the accomplishment of program objectives. This structure must address the major functions and responsibilities assigned to each staff position and must provide evidence of adequate mechanisms for staff supervision and support.

1304.52(a)(2)(ii) Management of early childhood development and health services, including child development and education; child medical, dental, and mental health; child nutrition; and, services for children with disabilities; and

1304.52(d)(7) Disability services must be supported by staff or consultants with training and experience in securing and individualizing needed services for children with disabilities.

1304.52(k)(3) At a minimum, this system must include ongoing opportunities for staff to acquire the knowledge and skills necessary to implement the content of the Head Start Program Performance Standards.

Following regs from 1308 apply only to programs serving preschool age children

1308.4(o)(1)...disabilities coordinator ...essential to assure that programs have the core capability to...

1.E) Does program implement procedures to ensure that its practices and facilities meet requirements of Sect. 504 of Rehab Act and Americans with Disabilities Act (ADA)? Does it make alterations/accommodations needed to enable participation of persons with disabilities in the program (including parents, staff, and community members)?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Self-reviews of program accessibility:</u> What procedure/tool does program use to assess its accessibility? Do they reference Sec. 504/ADA guidelines? Do they cover all areas of program activity?</p> <p><u>Renovation/Construction Plans:</u> Do plans address compliance with accessibility requirements of Sec. 504/ADA?</p> <p><u>Policy/Procedures:</u> Do materials contain information on non-discrimination and accessibility for persons with disabilities?</p>	
Persons Interviewed	<p><u>Program Director:</u> How do you assure the program's compliance with regulations on accessibility and non-discrimination based on disability (i.e., Sec 504/ADA)? Has the program received complaints about accessibility or discrimination?</p>	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<u>Disabilities Services Coordinator:</u> <ul style="list-style-type: none"> • What's your role in assuring compliance with regulations on accessibility and non-discrimination? Were there alterations made recently? • Are any still needed? How do you ensure your program is accessible to parents, staff, and community members? <u>Parents of Children with Disabilities:</u> How does the program ensure full participation for your child? If there were any accessibility problems, how were they addressed?	
Program Services Observed	<u>Tour of Facility:</u> <ul style="list-style-type: none"> • Are any barriers to program accessibility observed? • Have any barriers been removed recently in response to findings from program's self-assessment of its accessibility? 	

Relevant regulations:

1301.10(a) ...the following HHS regulations shall apply to all grants made under the Act: ...45 CFR part 84 Nondiscrimination on the basis of handicap in Federally assisted programs

1304.23(b)(1) ...must design and implement a nutrition program that meets the nutritional needs and feeding requirements of each child, including those with special dietary needs and children with disabilities...

1304.53(a)(2) Grantee and delegate agencies must provide appropriate space for the conduct of all program activities.

1304.53(a)(10)(xvii) Adequate provisions are made for children with disabilities to ensure their safety, comfort, and participation.

1304.53(b)(1) Grantee and delegate agencies must provide and arrange sufficient equipment, toys, materials, and furniture to meet the needs and facilitate the participation of children and adults. Equipment, toys, materials, and furniture owned or operated by the grantee or delegate agency must be: ...(iii)

Age-appropriate, safe, and supportive of the abilities and developmental level of each child served, with adaptations, if necessary, for children with disabilities;

Following regs from 1308 apply only to programs serving preschool age children

1308.4(o)(6) ...Grantees must make available assistive devices necessary to make it possible for a child to move, communicate, improve functioning or address objectives which are listed in the child's IEP.

1308.5(c) A grantee must not deny placement on the basis of a disability or its severity to any child when: 1) The parents wish to enroll the child; 2) The child meets the Head Start age and income eligibility criteria; 3) Head Start is an appropriate placement according to the child's IEP, and; 4) The program has space to enroll more children, even though the program has made ten percent of its enrollment opportunities available to children with disabilities. In that case children who have a disability and non-disabled children would compete for the available enrollment opportunities.

2. Coordination with Community Partners

How does the program ensure that its services to children with disabilities and their families are well coordinated with community partners, particularly the local education agencies (LEAs) and Part C agencies responsible for implementing the Individuals with Disabilities Education Act?

2.A) Is there an up-to-date interagency agreement with each of the LEAs (and/or PART C for programs serving infants and toddlers)?

2.B) Are the program's efforts to serve children with disabilities coordinated with the LEAs and Part C agencies responsible for implementing IDEA? Is there evidence of coordinated activities in: Recruitment and Enrollment; Identification of Children with Disabilities; Providing Services; and Transitions?

2.C) Are disabilities services activities coordinated with other community partners (e.g., family support, health, mental health)?

2.A.) Is there an up-to-date interagency agreement with each of the LEAs (and/or PART C for programs serving infants and toddlers)?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Disabilities Services Plan:</u></p> <ul style="list-style-type: none"> Does the plan address the development of interagency agreements (IAs) and partnerships with LEAs and Part c agencies? Does the plan identify all LEAs and/or Part C agencies in the service area? <p><u>Interagency agreements with LEAs and/or Part C agencies:</u></p> <ul style="list-style-type: none"> Are all LEAs and/or Part C agencies in service area represented? (Review map/list) Are agreements updated annually? How does the agreement address such specific activities as Child Find, joint training, transition, and resource sharing? 	
Persons Interviewed	<p><u>Disabilities Services Coordinator:</u></p> <ul style="list-style-type: none"> What is your role in developing IA's and partnerships? How do you keep these agreements up-to-date? What are significant accomplishments of your partnerships with LEA/ Part C agencies? 	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<u>LEA/Part C Partner:</u> <ul style="list-style-type: none"> • How were you approached to partner with this program? Is there a written interagency agreement? When was it updated last? • What are significant accomplishments of your partnerships with this program? Are there persistent problems? 	
Program Services Observed	<u>General Observations:</u> Are activities, resources, staffing, special education/related services, and supports being provided as outlined in the interagency agreement?	

Relevant regulations:

1304.41(a)(4) To enable the effective participation of children with disabilities and their families, grantee and delegate agencies must make specific efforts to develop interagency agreements with local education agencies (LEAs) and other agencies within the grantee and delegate agency's service area (see 45 CFR 1308.4(h) for specific requirements concerning interagency agreements).

Following regs from 1308 apply only to programs serving preschool age children

1308.4(l) The disabilities service plan must include commitment to specific efforts to develop interagency agreements with the LEAs and other agencies within the grantee's service area. If no agreement can be reached, the grantee must document its efforts and inform the Regional Office.

The agreements must address:

1308.4(l)(1)-(7) lists what agreements must address: 1) participate in Child Find; 2) Joint training of staff and parents; 3) Procedures: referral for evaluations, IEP meetings, placement decisions; 4) Transition; 5) Resource sharing; 6) data for annual Child Count report; 7) Other items as agreed; efforts to update agreements annually...

2.B) Are the program's efforts to serve children with disabilities coordinated with the LEAs and Part C agencies responsible for implementing IDEA? Is there evidence of coordinated activities in: Recruitment and Enrollment; Identification of Children with Disabilities; Providing Services; and Transitions?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Disabilities Services Plan/ Recruitment-Selection Plan:</u></p> <ul style="list-style-type: none"> • Do plans feature coordination of efforts? Are managers involved in coordinating and tracking these plans? Is there input from stakeholders? • Do plans describe collaboration in Child Find activities; referral procedures; IEP/IFSP meetings; providing services? <p><u>Staff Training/Guidance Documents:</u></p> <p>Does coordinated supervision and training guide and support staff in collaborative recruitment, identification, service delivery, and transitions?</p> <p><u>Child/Family Records:</u></p> <ul style="list-style-type: none"> • Is there clear documentation of the referral/evaluation process and decisions about services (i.e., eligibility criteria met, IEP/IFSP developed and signed, the schedule of services to be provided)? • Are timelines for assessments and receiving services recognized and met? • Are family partnership agreements and IFSPs coordinated? 	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<p><u>Disabilities Services Coordinator:</u></p> <ul style="list-style-type: none"> • How do you stay informed about State requirements for Early Intervention and Special Education? • How do you work with your partners in Child Find; referrals for evaluations; and IEP meetings and placement decisions? <p><u>LEA/Part C partner:</u></p> <ul style="list-style-type: none"> • What are strengths of coordination with HS/EHS agency? What are some challenges in this coordination? • How do you share information (i.e., child count and statewide requirements)? • Describe coordinated activity in such areas as recruitment, screening/assessments, service delivery, and transitions. <p><u>EHS/ HS Staff:</u> What kinds of support have you received from your Part C/LEA provider?</p> <p><u>Parent of child with disabilities:</u> Does this program work well with your child's service providers from the LEA or Part C agency? Can you give an example of how they cooperate to serve your child? Are there ways they should improve working together?</p>	

<i>continued from previous page</i>	Sources	Reviewer Notes
Program Services Observed	<u>Classroom Observation:</u> <ul style="list-style-type: none"> • Is there an active partnership with the LEA/Part C provider (i.e., activity logs, co-teaching plans, on-site consultation, etc.)? • Are activities, resources, staffing, special services, and supports being provided as outlined in the interagency agreement? 	

Relevant regulations:

1304.40(a)(3) To avoid duplication of effort, or conflict with, any preexisting family plans... the family partnership agreement must take into account, and build upon as appropriate, information obtained from the family and other community agencies concerning preexisting family plans. Grantee and delegate agencies must coordinate, to the extent possible, with families and other agencies to support the accomplishment of goals in the preexisting plans.

1304.41(a)(1)... must take an active role in community planning to encourage strong communication, cooperation, and the sharing of information among agencies and their community partners and to improve the delivery of community services to children and families in accordance with the agency's confidentiality policies. Documentation must be maintained to reflect the level of effort undertaken to establish community partnerships, including:...

1304.41(a)(2)(iv) Individuals and agencies that provide services to children with disabilities and their families

Following regs from 1308 apply only to programs serving preschool age children

1308.4(l) ...The agreements must address: (1) Head Start participation in the public agency's Child Find plan under Part B of IDEA;... (3) Procedures for referral for evaluations, IEP meetings and placement decisions;

1308.6(e)(1) The disabilities coordinator must refer a child to the LEA for evaluation as soon as the need is evident, starting as early as the child's third birthday.

2.C) Are disabilities services activities coordinated with other community partners (e.g., family support, health, mental health)?

	Sources	Reviewer Notes
Documents Reviewed	<u>Other Community Agreements:</u> <ul style="list-style-type: none"> • Are there agreements with other partners in disabilities services (beyond LEAs and Part C agencies)? • How do these partners support program's efforts to recruit and serve children with disabilities and their families? • Is there documentation of the support, e.g., in meeting summaries, letters of commitment; staffing/consulting agreements? 	
Persons Interviewed	<u>Disabilities Services Coordinator:</u> <ul style="list-style-type: none"> • How are your recruitment activities coordinated with disabilities services partners in the community? • How are local organizations identified for partnerships? • What is the most recent partnership to be developed? What are expected contributions by that partner? <u>Partner agencies:</u> What is the focus of your partnership? What are specific successes and challenges of this partnership?	

<i>Continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<u>EHS/HS Service Staff:</u> <ul style="list-style-type: none"> • How do you work with these partners? What kinds of support do they provide on behalf of children with disabilities and their families? • Do they offer training or consultation to improve disabilities services in your program? 	
Program Services Observed	<u>Classroom Observations/ Home Visits:</u> Are the resources described in partnership agreements evident in program settings? <u>Information displays:</u> Do displays provide evidence of collaborative work with partners?	

Relevant regulations:

1304.41(a)(1) Grantee and delegate agencies must take an active role in community planning to encourage strong communication, cooperation, and the sharing of information among agencies and their community partners and to improve the delivery of community services to children and families in accordance with the agency's

confidentiality policies. Documentation must be maintained to reflect the level of effort undertaken to establish community partnerships.

1304.41(a)(2) ...must take affirmative steps to establish ongoing collaborative relationships with community

organizations to promote the access of children and families to community services that are responsive to their needs, and to ensure that Early Head Start and Head Start programs respond to community needs, including:...

(iv) Individuals and agencies that provide services to children with disabilities and their families.

3. Identifying Children's Needs – IEP/IFSPs

How does the grantee ensure that the need for any early intervention, special education, and/or related services are identified promptly and in coordination with the Part C agency and/or LEA?

3.A) Is there a clear description of program policies and practices for identifying the needs of children with disabilities - from screening, through formal evaluation, to creating an IEP/IFSP?

3.B) Are the program's procedures for screening for sensory, behavioral, and/or developmental concerns well-defined, understood by staff, and implemented? Are prompt referrals made to the Part C or LEA (local education agency) when screening and/or developmental assessment results suggest a child needs formal evaluation for a possible disability?

3.C) Are procedures well-defined for moving from multi-disciplinary team evaluation to developing an IEP/IFSP? How are decisions made as to whether child needs special education or related services? Is Head Start participating in coordinated IEP/IFSP development?

3.D) Does program track whether children receive the assessments and/or services recommended for them? Does the program know about, and conform to, timelines for referrals, assessment and providing services? Do they know their State's requirements on timelines for implementing IDEA services?

3.A) Is there a clear description of program policies and practices for identifying the needs of children with disabilities - from screening, through formal evaluation, to creating an IEP/IFSP?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Disabilities Services Plan:</u></p> <ul style="list-style-type: none"> • Are program's plans for screening, referral, evaluation described? • Are requirements addressed regarding timelines, parental consent, and coordinating procedures with the LEA/Part C partner? • Are program policies on confidentiality and informed consent regarding disabilities services addressed? <p><u>Interagency Agreement:</u> How does the agreement address the coordination of referral, evaluation, and participation in IEP/IFSP teams?</p> <p><u>Parent Informed Consent Notice:</u> How clear/parent-friendly are these documents? Is information available in language of families enrolled in the program?</p>	

<i>Continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<u>Disabilities Services Coordinator:</u> <ul style="list-style-type: none"> • What are program procedures for screening, referral, evaluation, and IEP/IFSP planning? How do you assure appropriate involvement of HS/EHS staff, parents, local partners, consultants? • How does program train and supervise staff on implementing the identification procedures? <u>LEA/Part C Partners:</u> <ul style="list-style-type: none"> • What is your involvement in screening, referral, evaluation? How do you share records in this activity? • How do you and HS/EHS work to ensure confidentiality, parent consent, and timeliness of assessments? 	
Program Services Observed		

Relevant regulations:

1304.20(f)(2)(ii) Enrolled families with infants and toddlers suspected of having a disability are promptly referred to the local early intervention agency designated by the State Part C plan to coordinate any needed evaluations, determine eligibility for Part C services, and coordinate the development of an IFSP for children determined to be eligible under the guidelines of that State's program. Grantee and delegate agencies must support parent participation in the evaluation and IFSP development process for infants and toddlers enrolled in their program;

1304.51(g) ... must establish and maintain efficient and effective record-keeping systems to provide accurate and timely information regarding children, families, and staff and must ensure appropriate confidentiality of this information.

Following regs from 1308 apply only to programs serving preschool age children

1308.6(e)(1) The disabilities coordinator must refer a child to the LEA for evaluation as soon as the need is evident, starting as early as the child's third birthday.

1308.6(e)(3) Parental consent in writing must be obtained before a child can have an initial evaluation to determine whether the child has a disability.

1308.6(e)(4) Confidentiality must be maintained in accordance with grantee and State requirements. Parents must be given the opportunity to review their child's records in a timely manner and they must be notified and give permission if additional evaluations are proposed. Grantees must explain the purpose and results of the evaluation and make concerted efforts to help the parents understand them.

1308.19(i) A meeting must be held at a time convenient for the parents and staff to develop the IEP within 30 calendar days of a determination that the child needs special education and related services. Services must begin as soon as possible after the development of the IEP.

3.B) Are the program's procedures for screening for sensory, behavioral, and/or developmental concerns well-defined, understood by staff, and implemented? Are prompt referrals made to the Part C or LEA (local education agency) when screening and/or developmental assessment results suggest a child needs formal evaluation for a possible disability?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Service guides/training materials on screening:</u></p> <ul style="list-style-type: none"> • What is staff training/procedure guide for screening? • Are there protocols/guidelines for screening and referrals? • Do materials/displays describe steps that parents and staff should take when concerned about a child's development? <p><u>Child records:</u></p> <ul style="list-style-type: none"> • Review child records for completeness. Are staff or family concerns about child's development included? • Is there a record of referral process, evaluations completed and meeting of a multidisciplinary team? • Were eligibility criteria addressed? Were there meetings with parents for IEP/IFSP development? • Was there evidence of a systematic approach to assure assessments/services are provided? • Was timeliness of assessments and receiving services documented? 	

<i>continued from previous page</i>	Sources	Reviewer Notes
Documents Reviewed	<u>Screening tool:</u> <ul style="list-style-type: none"> • How was it selected? Any evaluation of its effectiveness (particularly from LEA/Part C partner)? • Were cultural/language issues considered? 	
Persons Interviewed	<u>Disabilities Services Coordinator:</u> <ul style="list-style-type: none"> • When screening results indicate a need for formal evaluation, how does the program assure a referral is promptly made to the Part C or LEA? Probe for knowledge of timelines for referrals, assessment and placement in their State. • How are staff trained on screening process? How are cultural/language issues addressed? <u>Teachers/Home Visitor:</u> What procedures do you follow when you become concerned about a child's development? What is your role in screening process? How are referrals made to the LEA/Part C agency are these done promptly?	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<u>Parents:</u> <ul style="list-style-type: none"> • How were you involved in screening, referral, evaluation of your child's needs? Did the program keep you informed and seek your input and consent when evaluating your child's needs for special services? • Were the evaluations and meetings done promptly? • Does program encourage parents to discuss concerns about their child's development with teachers or other staff? 	
Program Services Observed		

Relevant regulations:

1304.20(b)(1) In collaboration with each child's parent, and within 45 calendar days of the child's entry into the program, grantee and delegate agencies must perform or obtain linguistically and age appropriate screening procedures to identify concerns... To the greatest extent possible, these screening procedures must be sensitive to the child's cultural background.

1304.20(d) ...must implement ongoing procedures by which Early Head Start and Head Start staff can identify any new or recurring medical, dental, or developmental concerns so that they may quickly make appropriate referrals... These procedures must include: periodic observations and recordings, as appropriate, of individual children's developmental progress... In addition, these procedures must include observations from parents and staff.

Following regs from 1308 apply only to programs serving preschool age children

c1308.6(a) The disabilities coordinator must be involved with other program staff throughout the full process of assessment of children, which has three steps:1)...screened as the first step... 2) ...on-going developmental assessment....; (3) Only those children who need further, specialized assessment to determine whether they have a disability...proceed to the next step, evaluation...

1308.6(e) The disabilities coordinator must arrange for further, formal, evaluation of a child who has been identified as possibly having a disability, the third step.

1308.6(e)(1) The disabilities coordinator must refer a child to the LEA for evaluation as soon as the need is evident, starting as early as the child's third birthday.

3.C) Are procedures well-defined for moving from multi-disciplinary team evaluation to developing an IEP/IFSP? How are decisions made as to whether child needs special education or related services? Is Head Start participating in coordinated IEP/IFSP development?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Interagency Agreements:</u> How are IEP/IFSP procedures detailed in the IA? Are roles/responsibilities of IEP/IFSP teams outlined?</p> <p><u>IEPs/IFSPs:</u></p> <ul style="list-style-type: none"> • Who is listed as IEP/IFSP team members? Are they signed by LEA/Part C partners? • Are the strengths and needs contained in the child record addressed in the IEP/IFSP? • Are IEPs/IFSPs signed by representative of LEA or Part C agency? If not, explore coordination with LEA/Part C in identification/referrals. <p><u>Disabilities Services Plan:</u> What is the process for moving from an evaluation to an IEP/IFSP planning team? What role do HS/EHS staff play in the IEP/IFSP team?</p> <p><u>Staff Training/Procedures:</u></p> <ul style="list-style-type: none"> • Are there written guides/procedures for staff participation in IFSP/IEP planning meetings? • Is there guidance on effectively involving teaching staff and parents in these planning meetings? 	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<p><u>Disabilities Services Coordinator:</u></p> <ul style="list-style-type: none"> • How are evaluation and IEP/IFSP planning efforts coordinated with LEA/Part C agency? • How are families and staff involved in IEP/IFSP teams? • How does IEP/IFSP planning ensure strengths and needs are addressed in a timely manner? <p><u>LEA/Part C Partner:</u></p> <ul style="list-style-type: none"> • Describe procedures for multi-disciplinary team evaluation of HS/EHS children with suspected disabilities. • How are decisions made on a child's need for special education/related services? • Describe Head Start's role in IEP/IFSP development. <p><u>Staff and Parents:</u> How were you involved in assessments and IEP/IFSP planning?</p>	
Program Services Observed		

Relevant regulations:

1304.20(f)(2)(i) Services for infants and toddlers with disabilities and their families support the attainment of the expected outcomes contained in the IFSP for children identified under the infants and toddlers with disabilities program (Part C) of the Individuals with Disabilities Education Act, as implemented by their State or Tribal government;

Following regs from 1308 apply only to programs serving preschool age children

1308.19(b) Every child receiving services in Head Start who has been evaluated and found to have a disability and in need of special education must have an IEP before special education and related services are provided to ensure that comprehensive information is used to develop the child's program.

1308.19(c) When the LEA develops the IEP, a representative from Head Start must attempt to participate in the IEP meeting and placement decision for any child meeting Head Start eligibility requirements.

1308.19(d) If Head Start develops the IEP, the IEP must take into account the child's unique needs, strengths, developmental potential and the family strengths and circumstances as well as the child's disabilities.

1308.19(e)(4) A statement of the specific special education services to be provided to the child and those related services necessary for the child to participate in a Head Start program. This includes services provided by Head Start and services provided by other agencies and non-Head Start professionals.

1308.19(j) Grantees and their delegates must make vigorous efforts to involve parents in the IEP process...

1308.19(k) Grantees must initiate the implementation of the IEP as soon as possible after the meeting by modifying the child's program in accordance with the IEP and arranging for the provision of related services...

3.D) Does program track whether children receive the assessments and/or services recommended for them? Does the program know about, and conform to, timelines for referrals, assessment and providing services? Do they know their State's requirements on timelines for implementing IDEA services?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Disabilities Services Plan:</u></p> <ul style="list-style-type: none"> • How is tracking of screening, evaluation, and IEP/IFSP planning and service delivery addressed? • Are roles and responsibilities related to tracking clear? Are State requirements referenced in the plan? <p><u>Interagency Agreements:</u> Are State timelines & requirements reflected in the agreements?</p> <p><u>Program Documents:</u> Are there program guides on the timeframes for referral, evaluation and IEP/IFSP planning? Are there tracking reports for services?</p> <p><u>Training Materials:</u></p> <ul style="list-style-type: none"> • How are service timelines and requirements (including pertinent State requirements) outlined for staff? • Are there staff training materials/ procedural guides on tracking the timely receipt of special services for children with disabilities and their families? 	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<u>Disabilities Services Coordinator:</u> <ul style="list-style-type: none"> • How do you track the provision of disabilities services? What happens when they are not met? • How do you assure that you are meeting timelines, including those specific to your State? <u>Staff and Parents:</u> <ul style="list-style-type: none"> • Are you aware of timeframe requirements for assessments and services? • Have there been problems/delays in children receiving evaluations, IEP/IFSP planning meetings, or receiving services? 	
Program Services Observed		

Relevant regulations:

1304.20 (f)(2) To support individualization for children with disabilities in their programs, grantee and delegate agencies must assure that:

(i) Services for infants and toddlers with disabilities and their families support the attainment of the expected outcomes contained in the Individualized Family Service Plan (IFSP) for children identified under the infants and toddlers with disabilities program (Part C) of the IDEA, as implemented by their State or Tribal government

(ii) Enrolled families with infants and toddlers suspected of having a disability are promptly referred to the local early intervention agency designated by the State Part C plan to coordinate any needed evaluations, determine eligibility for Part C services, and coordinate the development of an IFSP for children determined to be eligible under the guidelines of that State's program. Grantee and delegate agencies must support parent participation in the evaluation and IFSP development process for infants and toddlers enrolled in their program;

Following regs from 1308 apply only to programs serving preschool age children

1308.6 Assessment of children - (multiple sections on assessment/determining needs)

1308.19(i) A meeting must be held at a time convenient for the parents and staff to develop the IEP within 30 calendar days of a determination that the child needs special education and related services. Services must begin as soon as possible after the development of the IEP.

4. Delivering Individualized Services to Children with Disabilities

How does the grantee ensure that children determined to have disabilities receive special education and related services needed through implementation of an IEP/IFSP?

4.A) Does program provide supervision and support to Head Start staff that enable them to address IEP/IFSP objectives for children with disabilities?

4.B) Does program ensure that the communication necessary to implement quality disabilities services occurs both within its program and with its partners and the parents of children with disabilities?

4.C) Does program follow-up/track to ensure that children receive the special education, early intervention, and related services outlined in their IEP/IFSP?

4.D) Has program provided facilities, equipment and any accommodations and special services required for the effective inclusion of children with disabilities?

4.A) Does program provide supervision and support to Head Start staff that enable them to address IEP/IFSP objectives for children with disabilities?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Guides and schedules for teacher supervision:</u> Is there a schedule/guideline on how frequently, and by whom, supervision and supports are provided to address objectives for children with disabilities?</p> <p><u>IEPs and IFSPs and or Child Records:</u> Is the supervision/support for staff on providing effective and timely services outlined in the IEP/IFSP?</p> <p><u>Consultant contracts and schedules:</u> Are the specific types and schedules of consultant activities outlined? Do consultants provide supervision and supports that program staff need to effectively address individualized objectives for children with disabilities?</p> <p><u>Agreements with special ed./related services providers:</u> How is support for individualization reflected in these documents? Are persons with needed expertise available to address IEP/IFSP objectives of enrolled children?</p> <p><u>Individualized plans for lessons/activities/ home visits:</u> Is the individualization required for children with disabilities and their families evident in these plans?</p>	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<p><u>Disabilities Services Coordinator:</u> Describe how supervision and support is provided to program staff on how to address IEP/IFSP objectives and include children in the full range of program activities. Discuss a child whose needs require the most supports for staff.</p> <p><u>Teaching Staff:</u></p> <ul style="list-style-type: none"> • Do you receive the information, guidance, resources needed to help children and families meet goals in their IFSPs/IEPs? • What kinds of support/supervision and training do you receive on individualizing for children with disabilities who are in your classroom? <p><u>Parents:</u></p> <ul style="list-style-type: none"> • Has your child received the special services called for in the IFSP/IEP? Are these the services you expected to receive; were the services provided as scheduled? • If services do not meet your expectations, does program describe a procedure for expressing your concerns? 	
Program Services Observed	<p><u>Curricular and routine activities:</u></p> <ul style="list-style-type: none"> • How are activities (including meals, self-care, etc.) modified to meet the needs of children with disabilities? • Are schedules/guidance displayed to prompt staff on ways to accommodate and individualize for specific children? 	

Relevant regulations:

1304.20(f)(2) To support individualization for children with disabilities in their programs, grantee and delegate agencies must assure that:

(i) Services ...support the attainment of the expected outcomes contained in the IFSP for children identified under(Part C) of the IDEA as implemented by their State or Tribal government....

(iv) They participate in the development and implementation of the IEP for preschool age children with disabilities, consistent with the requirements of 45 CFR 1308.19.

1304.21(a)(1) In order to help children gain the social competence, skills and confidence necessary to be prepared to succeed in their present environment and with later responsibilities in school and life, grantee and delegate agencies' approach to child development and education must(ii) Be inclusive of children with disabilities, consistent with their IFSP or IEP;

Following regs from 1308 apply only to programs serving preschool age children

1308.19(k) -- Grantees must initiate the implementation of the IEP as soon as possible after the IEP meeting by modifying the child's program in accordance with the IEP and arranging for the provision of related services. If a child enters Head Start with an IEP completed within two months prior to entry, services must begin within the first two weeks of program attendance.

4.B) Does program ensure that the communication necessary to implement quality disabilities services occurs both within its program and with its partners and the parents of children with disabilities?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>IEPs and IFSPs:</u> Are these plans current, clear, and accessible to those who will implement them?</p> <p><u>Correspondence/reports from special educators, and related services providers:</u> How do teachers and parents communicate on ways to address individualized objectives for children? How is IEP/IFSP progress tracked through such documents?</p> <p><u>Activity/Lesson Plans:</u> Do plans address individualized objectives and accommodations as required to address specific needs of children with disabilities in each classroom?</p> <p><u>Disabilities Services Plan:</u> Does plan address communication regarding planning and implementation of disability services to children with disabilities? How are partners, staff, and parents included?</p>	
	<p><u>Disabilities Services Coordinator:</u></p> <ul style="list-style-type: none"> • Describe systems for communication between staff, partners and families to address IEP/IFSP objectives for each child? • How do you assure individualized plans and records are available to those serving children with disabilities while ensuring confidentiality is respected? 	

<i>continued from previous page</i>	Sources	Reviewer Notes
	<p><u>Teaching staff:</u> How do you communicate with program staff, consultants, and parents about concerns or accomplishments of children with disabilities? Do you receive training and supervision on doing this?</p> <p><u>Parents:</u> Does the program ask for your opinion -- suggestions or complaints -- about services for your child? How do staff respond to your feedback?</p>	
Program Services Observed	<p><u>Availability of Records:</u> Are individual records stored to protect confidentiality and yet allow ready access to those who will use individualized plans in serving children?</p>	

Relevant regulations:

1304.21(c)(1) Grantee and delegate agencies, in collaboration with the parents, must implement a curriculum...that: (i) Supports each child's individual pattern of development and learning

1304.41(a)(1) ...must take an active role in community planning to encourage strong communication, cooperation, and the sharing of information among agencies and their community partners and to improve the delivery of community services to children and families in accordance with the agency's confidentiality policies.

Following regs from 1308 apply only to programs serving preschool age children

1308.4(i) The disabilities service plan must include options to meet the needs and take into consideration the strengths of each child based upon the IEP so that a continuum of services available from various agencies is considered.

1308.4(a)....disabilities service plan providing strategies for meeting the special needs of children with disabilities and their parents. The purposes of this plan are to assure ..all components of Head Start are appropriately involved in the integration of children with disabilities and their parents; and...(c) The plan must include provisions for children with disabilities to be included in the full range of activities and services normally provided to all Head Start children and provisions for any modifications necessary to meet the special needs of the children with disabilities

1308.6 (e)(4) Confidentiality must be maintained in accordance with grantee and State requirements. Parents must be given the opportunity to review their child's records in a timely manner and they must be notified and give permission if additional evaluations are proposed. Grantees must explain the purpose and results of the evaluation and make concerted efforts to help the parents understand them.

4.C) Does program follow-up/track to ensure that children receive the special education, early intervention, and related services outlined in their IEP/IFSP?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>IEP/IFSPs:</u></p> <ul style="list-style-type: none"> • Is there documentation that these plans were implemented and time-lines are being tracked? • How is progress toward goals documented? <p><u>Tracking Systems/Schedules:</u> How are systems designed and used to document a child's status in receiving services? How do staff report areas of achievement or concern?</p>	
Persons Interviewed	<p><u>Disabilities Services Coordinator:</u></p> <ul style="list-style-type: none"> • How do you ensure services outlined in the IEP/IFSP are provided? What systems do you use to track receipt of services? • What do you do when timeframes are not met? How do you address gaps or delays in services? <p><u>EHS/HS Staff:</u></p> <ul style="list-style-type: none"> • How do you receive information, guidance, resources you need to help children (and families) meet IEP/IFSP goals? • If you have a concern about whether child is receiving effective and/or timely special services, what is the procedure you would follow? <p><u>Parents:</u> If you have concerns about services called for in your child's IEP/IFSP, what would you do? Has program explained what your rights are when have such concerns?</p>	

<i>continued from previous page</i>	Sources	Reviewer Notes
Program Services Observed	<u>Use of service tracking systems:</u> Are systems for tracking the timely receipt of IEP/IFSP services available for use by staff with this responsibility?	

Relevant regulations:

1304.20(f)(2)(i) Services for infants and toddlers with disabilities and their families support the attainment of the expected outcomes contained in the IFSP for children identified under(Part C) of the IDEA as implemented by their State or Tribal government;

1304.20(f)(2)(iv) They participate in the development and implementation of the IEP for pre-school age children with disabilities, consistent with the requirements of 45 CFR 1308.19.

4.D) Has program provided facilities, equipment and any accommodations and special services required for the effective inclusion of children with disabilities?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Disabilities Services Plan:</u> Does plan address details of accessibility and accommodation across the full range of program services (i.e., child development, nutrition services, transportation, etc.)?</p> <p><u>IEPs/IFSPs:</u></p> <ul style="list-style-type: none"> • Are necessary accommodations to activities, equipment or settings described clearly? • Are staff/consultant roles in providing supports described? • How is implementation of plans being tracked and documented? • How are parents supported and involved? <p><u>Transition Plans:</u> Do plans consider necessary preparations for disabilities services transitions?</p>	
Persons Interviewed	<p><u>Disabilities Services Coordinator:</u> Describe your program's efforts to serve a child requiring the most substantial supports/accommodations this year. How were staff supported and trained to effectively include this child? How were parents and community partners involved?</p> <p><u>Health Services Coordinator:</u> How are staff trained/supported to address safety, health, nutrition needs of children with disabilities needing individualized supports in these areas?</p>	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<p><u>LEA/Part C Partner:</u> How are you involved in providing any special equipment, materials, or other supports for children requiring substantial accommodations? How have you worked with program to ensure these children's needs are met?</p> <p><u>Parent of child with more significant disabilities:</u> What accommodations has program made to ensure your child's special needs are met? Are you satisfied with these efforts? Are there areas needing improvement?</p> <p><u>EHS/HS Staff:</u> How do you acquire any special equipment and materials for a child who requires them? How do you meet the needs of children with disabilities who have special needs in health, safety, or nutrition?</p>	
Program Services Observed	<p><u>Classroom/home-visit:</u> Were required modifications made to materials/activities to address needs of children with disabilities as outlined in IEP/IFSP?</p>	

Relevant regulations:

1304.20(c)(4) ...must assist with the provision of related services addressing health concerns in accordance with...IEP...IFSP

1304.21(a)(5) In center-based settings...promote each child's physical development by (ii) Providing appropriate time, space, equipment, materials and adult guidance for the development of fine motor skills according to each child's developmental level; and (iii) Providing an appropriate environment and adult guidance for the participation of children with special needs.

1304.23(a)(2) Information about...feeding requirements of infants and toddlers and each child with disabilities

1310.22(c) ...specify any special transportation requirements for a child with a disability when preparing the child's IEP or IFSP, and ensure that in all cases special transportation requirements in a child's IEP or IFSP are followed...

Following regs from 1308 apply only to programs serving preschool age children

1308.4(g) The plan, when appropriate, must address strategies for the transition of children into Head Start from infant/toddler programs (0-3 years), as well as the transition from Head Start into the next placement. The plan must include preparation of staff and parents for the entry of children with severe disabilities into the Head Start program.

1308.18(c) Each Head Start director or designee must supervise the administration of all medications, including prescription and over-the-counter drugs, to children with disabilities in accordance with State requirements

1308.20(a) The disabilities coordinator must work with staff to ensure that provisions to meet special needs are incorporated into the nutrition program. (b) Appropriate professionals ...consulted on ways to assist Head Start staff and parents of children with severe disabilities with problems of chewing, swallowing and feeding themselves. (c) The plan for services for children with disabilities must include activities to help children with disabilities participate in meal and snack times with classmates.

5. Partnering with Families of Children with Disabilities

How does the grantee ensure that parents of children with disabilities are supported and involved as decision-makers and receive information and assistance in understanding and advocating for services and support needed to address their child's special needs?

5.A) Does program provide parent support and parent training related to disabilities issues?

5.B) Does program promote families' self-advocacy for services for their child with disabilities? Does program support families in role of decision-maker for their child? Do they ensure parents are well informed as they make decisions for their child in Head Start/EHS. Does program help them understand their rights under IDEA and in dealing with other agencies?

5.C) Does program assist families in preparing for transitions regarding disabilities services, both into Head Start/EHS and into subsequent placements?

5.A) Does program provide parent support and parent training related to disabilities issues?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Parent education schedules:</u> How are topics and presenters selected? Are there follow-up activities with parents to help them act on information provided?</p> <p><u>Staff procedures/training:</u> How is staff trained/supported to approach and support families in addressing disabilities issues?</p> <p><u>Resource materials:</u> Are materials from local parent support groups available and being used?</p> <p><u>Child/family records:</u> Is there evidence of facilitated referrals to respite care, parent education/support?</p> <p><u>Family partnership agreements:</u> Are IFSPs included/referenced? Are disabilities service supports included?</p>	
Persons Interviewed	<p><u>Disabilities Services Coordinator:</u> How do staff receive information/support on addressing exceptional needs for individualized supports for children (e.g., special safety, health, and nutrition needs)? Is communication with family regarding these needs supported?</p>	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<p><u>Family Partnership Staff:</u></p> <ul style="list-style-type: none"> • How are you trained/ supported in responding to family concerns about disabilities issues? • Are family partnership agreements coordinated with individualized disabilities service plans? <p><u>Parents:</u></p> <ul style="list-style-type: none"> • How have you been encouraged and supported to participate in your child's overall program activities? • Have you been encouraged to participate in program level decision-making about disabilities services (e.g., budget, facilities, staffing)? • Are family partnership agreements coordinated with individualized plans for disabilities services? 	
Program Services Observed	<p><u>Home Visit:</u> Is there attention to any special issues facing parents of children with disabilities?</p> <p><u>Information displays:</u> Do displays reflect parent information and support on disabilities services issues?</p>	

Relevant regulations:

1304.40(e)(3) Grantee and delegate agencies must provide opportunities for parents to enhance their parenting skills, knowledge, and understanding of the educational and developmental needs and activities of their children and to share concerns about their children with program staff...

Following regs from 1308 apply only to programs serving preschool age children

1308.21(a) In addition to the many references to working with parents throughout these standards, the staff must carry out the following tasks: (1) Support parents of children with disabilities entering from infant/toddler programs; (2) Provide information to parents on how to foster the development of their child with disabilities; (3) Provide opportunities for parents to observe large group, small group and individual activities describe in their child's IEP; (4) Provide follow-up assistance and activities to reinforce program activities at home; (5) Refer parents to groups of parents of children with similar disabilities who can provide helpful peer support.

5.B) Does program promote families' self-advocacy for services for their child with disabilities? Does program support families in role of decision-maker for their child? Do they ensure parents are well informed as they make decisions for their child in Head Start/EHS. Does program help them understand their rights under IDEA and in dealing with other agencies?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Disabilities Services Plan:</u> Does the plan include supporting families in making decisions regarding disabilities services? What activities support self-advocacy?</p> <p><u>Staff procedures:</u> What are procedures for informing supporting parents on advocacy issues/concerns on disabilities issues?</p> <p><u>Resource materials:</u> Are resources/materials from local advocacy and support groups available to help parents advocate for themselves?</p> <p><u>Family partnership agreements:</u> Do agreements include activities to promote self-advocacy?</p> <p><u>Internal dispute resolution procedures:</u> Do these procedures provide opportunities for family self-advocacy on disabilities services issues?</p>	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<p><u>Disabilities Services Coordinator:</u></p> <ul style="list-style-type: none"> • How does your program assure that parents are fully informed of their rights under IDEA and are supported in their role as decision-maker for their child? • What program activities promote family self-advocacy, both within Head Start and in dealing with other agencies? <p><u>Family Partnership Staff:</u> What activities are conducted with families of children with disabilities to support their self-advocacy in this area? How do you help inform them about disabilities services and their rights?</p> <p><u>Teaching staff:</u> What support/direction do you receive on addressing parent concerns about their child's special services?</p> <p><u>Parents:</u></p> <ul style="list-style-type: none"> • Does program support you in decision-making regarding disabilities services? How do they help you learn about rights under IDEA? • Do they support you in advocating for your child and family to receive disabilities services? 	
Program Services Observed		

Relevant regulations:

1304.20(f)(2)(ii) ...Grantee and delegate agencies must support parent participation in the evaluation and IFSP development process for infants and toddlers enrolled in their program;

1304.40(a)(3) To avoid duplication of effort...the family partnership agreement must take into account, and build upon as appropriate, information obtained from the family and other community agencies....must coordinate, to the extent possible, with families and other agencies to support the accomplishment of goals in the preexisting plans.

Following regs from 1308 apply only to programs serving preschool age children

1308.21(a)(6) Inform parents of their rights under IDEA.

1308.21(a)(7) Inform parents of resources which may be available to them from the ...SSI Program, the ...EPSDT Program and other sources and assist them with initial efforts to access such resources.

1308.21(a)(10) build parent confidence, skill and knowledge in accessing resources and advocating to meet the special needs of their children.

5.C) Does program assist families in preparing for transitions regarding disabilities services, both into Head Start/EHS and into subsequent placements?

	Sources	Reviewer Notes
Documents Reviewed	<p><u>Disabilities Services Plan:</u> Does the plan describe efforts to assist families of children with disabilities in transitioning to other programs?</p> <p><u>Staff procedures:</u> What are procedures to inform and support parents of children with disabilities regarding transitions?</p> <p><u>Transition Plans:</u> Do transition plans for children with disabilities reflect support and information for parents as they explore and decide upon appropriate services for their children?</p>	
Persons Interviewed	<p><u>Disabilities Services Coordinator:</u></p> <ul style="list-style-type: none"> • Describe your program's approach/activities to promote transitions for children with disabilities and their families. • If program has both EHS and HS, how do you support transitions for children with disabilities between these programs? • How do you support the family through transitions from Part C to preschool/LEA providers? 	

<i>continued from previous page</i>	Sources	Reviewer Notes
Persons Interviewed	<u>Parents:</u> <ul style="list-style-type: none"> • How did the program help you in the transition from one program to another? • Has the program offered to arrange and/or accompany you on a visit to the program your child may transition to next year? 	
Program Services Observed		

Relevant regulations:

1304.20(f)(2)(iii) They participate in and support efforts for a smooth and effective transition for children who, at age three, will need to be considered for services for preschool age children with disabilities;

1304.40(h)(1) ...must assist parents in becoming their children's advocate as they transition both into Early Head Start or Head Start from the home or other child care setting, and from Head Start to elementary school, a Title I of the ESEA preschool program, or a child care setting

1304.41(c)(2) ...in Early Head Start, transition planning must be undertaken for each child and family at least six months prior to the child's third birthday. The process must take into account: The child's health status and developmental level, progress made by the child and family while in Early Head Start, current and changing family circumstances, and the availability of Head Start and other child development or child care services in the community. As appropriate, a child may remain in EHS, following his or her third birthday, for additional months until he or she can transition into Head Start or another program

Following regs from 1308 apply only to programs serving preschool age children

1308.21(b) Grantees must plan to assist parents in the transition of children from Head Start to public school or other placement, beginning early in the program year.

1308.21(c) Head Start grantees, in cooperation with the child's parents, must notify the school of the child's planned enrollment prior to the date of enrollment.

Disabilities Services Monitoring Reference Sheet

As a member of the PRISM Review team, you can get important information on disabilities services from fellow reviewers. The following references to disabilities services are contained in other Core Questions (nearly verbatim).

Disabilities Services Protocol	Other PRISM activity
1. <u>Program Planning and Management</u>	<p><u>Ongoing Monitoring Q5</u> Ongoing monitoring to ensure tracking of patterns of progress and accomplishments for groups of children in learning and development, as well as in health and disabilities services...</p> <p><u>Human Resources Q7</u> How effective is the grantee's human resources management system in supporting the implementation of quality services to children and families? How does the system ensure that: all required functions (e.g. content area experts, etc.) are appropriately assigned? adequate provisions for staff supervision and support? all staff are qualified for their positions?</p> <p><u>Fiscal Management Q8</u> the budget is developed and approved to support program goals and objectives? status reports reflect the appropriate use of funds to support quality services?</p> <p><u>ERSEA Q17</u> - recruit and enrollment of children with disabilities</p> <p><u>Facilities, Material, Equipment Q18</u> Facilities, materials and equipment are accessible per 504 requirements</p>

Disabilities Services Protocol	Other PRISM activity
2. <u>Coordination with Community Partners</u>	<p><u>Communication Q3</u> ...ensure strong communication, cooperation, and information sharing among agencies and their community partners (e.g., LEA or Part C agency, child care providers, etc.)?</p> <p><u>Community Partnerships Q16</u> ...partner with LEA/Part C; coordinated services for children with disabilities</p>
3. <u>Delivering individualized services to children with disabilities</u>	<p><u>Record-Keeping and Reporting Q4</u> How efficient and effective are the record-keeping and reporting systems in providing accurate, confidential, and timely information regarding children, families, and staff and in supporting quality services?</p> <p>How are the record-keeping and reporting systems used to manage data and generate status reports that provide information on preschool children's progress?</p>
4. <u>Delivering individualized services to children with disabilities</u>	<p><u>Curriculum and Assessment Q13</u> Curriculum supports inclusion of children w/disabilities</p>
5. <u>Partnering with families of children with disabilities</u>	<p><u>Parent Involvement Q15</u> ...in developing and implementing services for children with disabilities</p>

Other PRISM Activities with Relevant References for Disabilities Services

Focus Children and Families p.17

Selecting Focus Children and Their Families. The team leader will select the children and their families that will be a focus of the data-gathering activities during the On-Site Activities phase of the review...Careful attention should be given to ensure that the children selected reflect the age groups served as well as (1) families involved in child care partnerships and (2) children with disabilities, including at least one child with more significant disabilities.

Health and Safety Checklist (page c.6)

Area #2: Indoor Facilities

• Facility Layout and Environment

3. Facilities enable the safe and effective participation of children with disabilities.
[1308.4(o)(4)]

Transportation Services Checklist (pp. c.30-36)

17. Grantee and delegate agencies have arranged for or provide transportation for children with disabilities to and from the program and to special clinics or other service providers when the special education and related services cannot be provided on-site.
[1308.4(h)(6), 1310.22(b)]
19. Appropriate staff is informed of any health or safety accommodations or adaptations needed for children in accordance with the program's confidentiality policy.
[1304.22(b)(3)]
36. Each bus driver has received a combination of classroom and behind-the-wheel training prior to transporting any child enrolled in the agency's program, and refresher training annually, on how to:... operate any special equipment, such as wheelchair lifts, assistance devices or special occupant restraints;

Elsewhere -- in the Regulations

45 CFR 1305.2(a) Children with disabilities means children with mental retardation, hearing impairments including deafness, speech or language impairments... who, by reason thereof need special education and related services.

45 CFR 1305.3(c) Each Early Head Start and Head Start grantee agency must conduct a Community Assessment within its service area once every three years. The Community Assessment must include the collection and analysis of the following information about the grantee's Early Head Start or Head Start area: ... (3) The estimated number of children with disabilities four years old or younger, including types of disabilities and relevant services and resources provided to these children by community agencies;

45 CFR 1306.31(c) When assigning children to a particular program option, Head Start grantees that operate more than one program option must consider such factors as the child's age, developmental level, disabilities, health or learning problems, previous preschool experiences and family situation. Grantees must also consider parents' concerns and wishes prior to making final assignments.

45 CFR 1306.32(b)(5) Each individual child is not required to receive the minimum days of service, although this is to be encouraged in accordance with Head Start policies regarding attendance. The minimum number of days also does not apply to children with disabilities whose individualized education plan may require fewer planned days of service in the Head Start program.

45 CFR 1309.3(p) Suitable facility means a facility which is large enough to meet the foreseeable needs of the Head Start program and which complies with local licensing and code requirements and the access requirements of the Americans with Disabilities Act (ADA), if applicable, and section 504 of the Rehabilitation Act of 1973.

45 CFR 1310.22(a) Effective January 18, 2006 each agency must ensure that there are school buses or allowable alternate vehicles adapted or designed for transportation of children with disabilities available as necessary to transport such children enrolled in the program. This requirement does not apply to the transportation of children receiving home-based services unless school buses or allowable alternate vehicles are used to transport the other children served under the home-based option by the grantee. Whenever possible, children with disabilities must be transported in the same vehicles used to transport other children enrolled in the Head Start or Early Head Start program. (See also 1310.22(b-c))

Mental Health Services Protocol

1. Program Planning and Management for Quality Mental Health Services

How does the grantee ensure that the program is *designed and managed* to ensure that the service of a mental health professional (or professionals) is on a *regular schedule of sufficient frequency to ensure the timely and effective identification of and intervention in family and staff concerns about a child?*

1.A Coordination with Community Mental Health Resources

How does the grantee ensure that other community mental health resources are used as needed?

2. Early Identification of Children's Mental Health Needs

How does the grantee ensure that each child receives an *appropriate and timely* (within 45 days of the child's entry into the program) *screening to identify*, using *multiple sources of information*, and *address any behavioral, social, emotional concerns?*

3. Parent Involvement in Children's Mental Health

How does the grantee ensure that staff *works with parents to discuss and identify appropriate responses to their children's behavior* including how to *strengthen nurturing, supportive environments and relationships in the home and at the program?*

4. Mental Health Education and Intervention for Parents

How does the grantee ensure that *parents receive mental health education* on issues that place families at risk (including for *pregnant women education and referrals* if needed for *maternal depression and substance abuse*) and other appropriate intervention, including *opportunities to participate in counseling programs?*

5. Special Help for Children's Individualized Mental Health Needs

How does the grantee ensure that parents, program staff, and the mental health professional design and implement program practices that are *responsive to the identified behavioral and mental health concerns of an individual or group of children* including *providing special help to children with atypical behavior?*

Mental Health Services Protocol

1. Program Planning and Management for Quality Mental Health Services

How does the grantee ensure that:

- the program is designed and managed to ensure that the service of a mental health professional (or professionals) is on a regular schedule of sufficient frequency to ensure the timely and effective identification of and intervention in family and staff concerns about a child?

1304.24(a)(2); 1304.24(a)(3)

1304.21(c)(1)(iii); 1304.51(a)(1)(iii); 1304.51(g)-(h)(1); 1304.51(i)(1); 1304.52(a)(1); 1304.52(a)(2)(ii); 1304.52(b)(1); 1304.52(d); 1304.52(d)(4); 1304.52(j)(3); 1304.52(k)(1); 1308.18(b)

Document Review:

- Review any contracts, or employee job descriptions for mental health professionals. Look for:
 - any posted on-site schedule of the mental health professional;
 - evidence that program self-assessment has resulted in modifications to the contract when necessary; and
 - evidence that the mental health professional has license/certification and experience and expertise serving young children and their families (per 1304.52(d)(4)). If the program has been unsuccessful in locating a mental health professional with birth to three expertise, is their evidence that shows how the program is supporting the MH provider to engage in learning experiences in the area of infant mental health?
- Review job descriptions or contracts for evidence of staff and parent input on the services the mental health professional provides. Note any evidence of opportunities to staff and parents to share their mental health or behavioral concerns about their child with the mental health professional.
- Review any interagency agreements with community partners providing mental health services for the program.
- Review records of mental health services provided.
 - Do administrative/policy records demonstrate attention to and support of mental health services? (Records of policy council, budgets, staffing, training)
 - Does the program self-assessment address the usefulness, sufficiency, and timeliness of the mental health service?

Interview:

- Ask staff about their access to the mental health professional (including frequency of assistance for mental health promotion activities, as well as in times of crisis). What do they know about the type of mental health services available? How would they request mental health information/assistance for a child or family they serve? How timely are services accessed and/or is consultation provided? How is mental health integrated into the curriculum?
- Interview parents to determine if any mental health related concerns they have had have been responded to in a timely manner, i.e. have their children received timely and effective intervention for any mental health related concerns?
- Interview the Disabilities Services Coordinator to determine how the mental health professional has collaborated with the Disabilities Services Coordinator?
- Interview with mental health professional regarding their role.
 - How are you involved in the planning/review of mental health services?
 - Is the schedule of services frequent enough to be familiar with the program, staff, and needs of children and to provide the consultation and services needed in a timely fashion?
 - How has the program responded to any recommendations you have made on program-wide practices that could improve mental health services?
 - How are you involved in mental health promotion activities?

Observation:

- If possible, observe a consultation to direct service staff (teacher/home visitors, etc.).
- Review information from classroom observations regarding teacher's knowledge/skill in addressing behavioral/mental health concerns and in practices that promote mental health.

1. Program Planning and Management for Quality Mental Health Services

How does the grantee ensure that the program is designed and managed to ensure that the service of a mental health professional (or professionals) is on a regular schedule of sufficient frequency to ensure the timely and effective identification of and intervention in family and staff concerns about a child?

	Suggested Sources	Actual Sources
Documents Reviewed	Contracts or employee job descriptions Posted schedule for mental health professional Interagency agreements with community partners Records of mental health services provided Program service plans Self-assessment	
Persons Interviewed	Staff about access to mental health professional Parents Mental health professional Mental health manager or supervisor who has responsibility for mental health	
Program Services Observed	If possible, consultation to direct service staff Information from classroom observations	

Relevant Regulations (1304.24(a)(2); 1304.24(a)(3))**1304.24 Child mental health.**

(a) Mental health services (2) Grantee and delegate agencies must secure the services of mental health professionals on a schedule of sufficient frequency to enable the timely and effective identification of and intervention in family and staff concerns about a child's mental health; and (3) Mental health program services must include a regular schedule of onsite mental health consultation involving the mental health professional, program staff, and parents on how to: (i) Design and implement program practices responsive to the identified behavioral and mental health concerns of an individual child or group of children; (ii) Promote children's mental wellness by providing group and individual staff and parent education on mental health issues; (iii) Assist in providing special help for children with atypical behavior or development; and (iv) Utilize other community mental health resources, as needed.

1.A. Coordination with Community Mental Health Resources

How does the grantee ensure that:

- other community mental health resources are used as needed?

1304.24(a)(3)(iv); 1304.41(a)(2)(ii).5

1304.41(a)(1)-(2); 1304.41(c)(1)(ii)

Document Review:

- Review program service plans.
- Review any interagency agreements with community partners providing mental health services for the program.
- Review lists of members on any relevant advisory committees to note possible community mental health resources as partners (e.g., Health Services Advisory Committee). If relevant, review meeting minutes to note evidence of community mental health resources participating as partners.

Interview:

- Interview community partners, ask policy groups about planning and coordination with mental health resources.
- Interview family service staff and the mental health professional on their knowledge of relevant mental health community services.
 - Do they have specific knowledge necessary to make a successful referral?
 - Has the program identified partners who have special focus such as domestic violence, substance abuse, maternal depression, and infant mental health?
 - Has the program sought partners with cultural competence in mental health services for families from diverse cultures?
 - Is staff knowledgeable of resources, including insurance systems that must be navigated to secure more extensive mental health services?
 - Is the mental health professional knowledgeable/experienced in coordinating with community mental health providers?

Observation:

- Observe any relevant displays or available materials for families providing information and education on community mental health resources.

1.A Coordination with Community Mental Health Resources

How does the grantee ensure that other community mental health resources are used as needed?

	Suggested Sources	Actual Sources
Documents Reviewed	Program service plans Interagency agreements with community partners Resource lists of community services for specialized services (e.g. domestic violence, substance abuse, mental health, crisis intervention) Lists of members on any relevant advisory committees	
Persons Interviewed	Community partners Policy groups Family service staff	
Program Services Observed	Relevant displays or available materials for families on mental health resources	

Relevant Regulations (1304.24(a)(3)(iv); 1304.41(a)(2)(ii))**1304.24 Child mental health.**

(a) Mental health services (3) Mental health program services must include a regular schedule of onsite mental health consultation involving the mental health professional, program staff, and parents on how to: ... (iv) Utilize other community mental health resources, as needed.

1304.41 Community Partnerships

(a) Partnerships (2) Grantee and delegate agencies must take affirmative steps to establish ongoing collaborative relationships with community organizations to promote the access for children and families to community services...including: (ii) Mental health providers

2. Early Identification of Children's Mental Health Needs

How does the grantee ensure that:

- each child receives an appropriate and timely (within 45 days of the child's entry into the program) screening to identify, using multiple sources of information, and address any behavioral, social, emotional concerns?

1304.24(a)(3)(iv); 1304.41(a)(2)(ii).5

1304.20(a)(1)(ii)-(iv); 1304.20(d); 1304.20(f)(1); 1304.21(a)(3)(i)(A)-(E);
1304.21(b)(1)(i)-(ii); 1304.21(b)(2)(i); 1304.21(c)(1)(iv)-(vi)

Document Review:

- Review record of completing screening within required time frame.
- Review how decisions on need for further evaluation are made, communicated with parents, and tracking the receipt of services.
- Review record keeping – does the program protect confidentiality and yet promote use of information by those who need to know it and apply it?
- Review records to determine how multiple sources of data are used to identify and address social, emotional, and/or behavioral concerns (other sources of data may include: developmental history, health history, observations, family functioning, family input, etc.).
- Review screening tool for reliability and validity (i.e. does the screening tool appropriately screen for social, emotional, and behavioral concerns?).

Interview:

- Interview the mental health professional to determine how the screening instruments are selected, used, how effective they are and how the results of the screening are used to inform practice.
 - Did the selection of the screening tool and the interpretation of the screening results take into consideration factors related to cultural, linguistic, and age appropriateness?
 - How does the program ensure timely referrals for further assessment and treatment if needed?
 - How does the mental health professional solicit and share ideas on how to address children's mental health needs (with staff and parents)?

- Interview teachers to determine how the program supports children's emotional and social development; how the home language is supported and respected; and how emotional security is promoted for infants and toddlers.
- Interview Early Head Start teachers to determine evidence of consistent teachers over an extended period of time.

Observation:

- If possible ask a person involved in the screening procedure to demonstrate the screening.
- Record-keeping system – how do you protect confidentiality and promote use of information needed?
- Observe information related to social/emotional development on the Classroom Observation Form item #4.
- Observe teacher/child interaction for examples of responsive and respectful communication to encourage the development of trust, self-esteem, and identity - these may include smiling at the child, comforting an infant in distress, providing reassurance, acknowledging the child's feelings, encouraging problem solving and cooperation.
- Observe the teachers setting age-appropriate limits.

2. Early Identification of Children's Mental Health Needs

How does the grantee ensure that each child receives an appropriate and timely (within 45 days of the child's entry into the program) screening to identify, using multiple sources of information, and address any behavioral, social, emotional concerns?

	Suggested Sources	Actual Sources
Documents Reviewed	Records of screening including multiple sources of information, Screening tool Records of screening follow-up Curriculum Procedures to identify new or recurring concerns	
Persons Interviewed	Mental health professional Teachers Managers	
Program Services Observed	If possible, watch demonstration of screening Record-keeping system, Classroom Observation Form	

Relevant Regulations (1304.20(b)(1); 1304.20(b)(2); 1304.20(b)(3))

1304.20 Child health and developmental services. (b) Screening for developmental, sensory, and behavioral concerns.

(1) In collaboration with each child's parent, and within 45 calendar days of the child's entry into the program, grantee and delegate agencies must perform or obtain linguistically and age appropriate screening procedures to identify concerns regarding a child's developmental, sensory (visual and auditory), behavioral, motor, language, social, cognitive, perceptual, and emotional skills (see 45 CFR 1308.6(b)(3) for additional information). To the greatest extent possible, these screening procedures must be sensitive to the child's cultural background. (2) Grantee and delegate agencies must obtain direct guidance from a mental health or child developmental professional on how to use the findings to address identified needs. (3) Grantee and delegate agencies must utilize multiple sources of information on all aspects of each child's development and behavior, including input from family members, teachers, and other relevant staff who are familiar with the child's typical behavior.

3. Parent Involvement in Children's Mental Health

How does the grantee ensure that:

- staff works with parents to discuss and identify appropriate responses to their children's behavior including how to strengthen nurturing, supportive environments and relationships in the home and at the program?

1304.24(a)(1)(i)-(vi)

1304.20(c)(1); 1304.20(e)(2)-(3); 1304.40(f)(1); 1304.40(f)(4)(i)-(iii)

Document Review:

- Review service plans for mental health for evidence of parent education and support to strengthen environments and relationships.
- Review child records for parent participation on any needed mental health interventions.
- Review staff handbook, training, procedures for information on child guidance with particular attention to information on age appropriate social behaviors, varying temperaments, realistic behavioral expectations for young children, setting appropriate limits and opportunities to encourage self-discipline.
- Review parent education materials and training agendas/attendance rosters (including materials and training topics to help parents better understand mental health issues and identify appropriate responses to children's behavior).
- Review home visitor protocols/curricula.

Interview:

- Interview teachers and home visitors to determine how they and parents share positive approaches on responding to/guiding children's behavior.
 - Does the program help parents to understand the range of behaviors they might experience with their child, and when there may be cause for concern? Does the program help parents to understand how their own mental health is connected to and impacts on their child's mental health?
- Interview family service, teaching staff and parents to determine how staff assists parents to strengthen relationships and environments.
- Interview family service, teaching staff and parents to determine parent's active involvement in their children's mental health services.
- Interview the mental health professional to determine how she/he solicits and shares ideas on how to address children's mental health needs (with staff and parents)?

Observation:

- Observe how home visitors encourage/support parents to respond to their children in a way that supports the development of trust, self-esteem and identity.
- Observe family service and/or teachers with parents (if possible) to see evidence of staff sharing child observations and/or discussing and anticipating with parents their child's behavior and development.
- Does the program have space for meetings with parents which allow privacy conducive to discussing sensitive issues?

3. Parent Involvement in Children's Mental Health

How does the grantee ensure that staff works with parents to discuss and identify appropriate responses to their children's behavior including how to strengthen nurturing, supportive environments and relationships in the home and at the program?

	Suggested Sources	Actual Sources
Documents Reviewed	Program service plans Staff handbook, training, procedures Parent education materials Training agendas Home visitor protocols/ curricula	
Persons Inter-viewed	Teachers Home visitors Parents Family Service Staff	
Program Services Observed	Teacher/child interaction Home visitors encouraging parents Family service workers, teachers, and home visitors providing, sharing, and soliciting information from parents about children's mental health and development	

Relevant Regulations (1304.24(a)(1)(i)-(vi))

1304.24 Child mental health.

(a) Mental health services. (1) Grantee and delegate agencies must work collaboratively with parents (see 45 CFR 1304.40(f) for issues related to parent education) by: (i) Soliciting parental information, observations, and concerns about their child's mental health; (ii) Sharing staff observations of their child and discussing and anticipating with parents their child's behavior and development, including separation and attachment issues; (iii) Discussing and identifying with parents appropriate responses to their child's behaviors; (iv) Discussing how to strengthen nurturing, supportive environments and relationships in the home and at the program; (v) Helping parents to better understand mental health issues; and (vi) Supporting parents' participation in any needed mental health interventions.

4. Mental Health Education and Intervention for Parents

How does the grantee ensure that:

- parents receive mental health education on issues that place families at risk (including, for pregnant women, education and referrals if needed for maternal depression and substance abuse) and other appropriate intervention, including opportunities to participate in counseling programs?

1304.40(b)(1)(ii); 1304.40(c)(1)(iii); 1304.40(c)(2)

1304.20(c)(1); 1304.20(e)(2)-(3); 1304.40(f)(1); 1304.40(f)(4)(i)-(iii)

Document Review:

- Review the schedule of parent education activities for content related to mental health services. Were these covered: substance abuse, domestic violence, mental health issues for pregnant women?
 - How were topics and presenters selected? Are there any evaluation/satisfaction reports? Did parents regard education activities as useful? Did the program conduct any follow-up activities with individuals or groups of parents?

What procedures are in place to prompt or guide program staff serving pregnant women on mental health concerns including maternal depression?

- Review any relevant resource books or lists of counseling programs, support groups, community resources, and/or prevention programs. Determine how the staff works with parents to identify and continually assess referrals, services, and resources to ensure they are responsive to individual family interests and goals.
- Review relevant child/family records to see evidence of referrals for families for counseling, substance abuse treatment, maternal depression, etc.

Interview:

- Interview family service staff; probe on how they have been trained/supported in identifying and responding to mental health concerns for parents/families and how they follow-up with families to determine whether referrals met families' expectations and circumstances.
- Interview with focus family: Are mental health issues covered in parent education? Does the family perceive the Head Start program as a safe and caring place where they can raise possible mental health concerns their family may be facing with the expectation the program will try to help them?

Observation:

- Do information displays communicate that the program is interested and able to provide support on mental health concerns, including domestic violence, substance abuse, etc.?
- Does the program have space for family services/meetings which allow privacy conducive to discussing sensitive issues?
- Observe a parent support/education meeting and note opportunities provided to address mental health topics including preventive education, reducing risks, and accessing mental health services.
- Observe home visit for attention/responsiveness to mental health issues facing families.

4. Mental Health Education and Intervention for Parents

How does the grantee ensure that parents receive mental health education on issues that place families at risk (including for pregnant women education and referrals if needed for maternal depression and substance abuse) and other appropriate intervention, including opportunities to participate in counseling programs?

	Suggested Sources	Actual Sources
Documents Reviewed	Schedule of parent education activities List of trainings offered to parents Program service plans Relevant resource books or lists of counseling programs Relevant child/family records	
Persons Interviewed	Family Partnership staff Focus family	
Program Services Observed	Information displays Program space for confidential meetings Parent support/education meeting Home visit	

Relevant Regulations (1304.40(b)(1)(ii); 1304.40 (c)(1)(iii); 1304.40(c)(2))

1304.40 Family partnerships. (b) Accessing community services and resources. (1) Grantee and delegate agencies must work collaboratively with all participating parents to identify and continually access, either directly or through referrals, services and resources that are responsive to each family's interests and goals, including: (ii) Education and other appropriate interventions, including opportunities for parents to participate in counseling programs or to receive information on mental health issues that place families at risk, such as substance abuse, child abuse and neglect, and domestic violence; (c) Services to pregnant women who are enrolled in programs serving pregnant women, infants, and toddlers. (1) Early Head Start grantee and delegate agencies must assist pregnant women to access comprehensive prenatal and postpartum care, through referrals, immediately after enrollment in the program. This care must include: (iii) Mental health interventions and follow-up, including substance abuse prevention and treatment services, as needed. (2) Grantee and delegate agencies must provide pregnant women and other family members, as appropriate, with prenatal education on fetal development (including risks from smoking and alcohol), labor and delivery, and postpartum recovery (including maternal depression).

5. Special Help for Children's Individualized Mental Health Needs

How does the grantee ensure that:

- **parents, program staff and the mental health professional design and implement program practices that are responsive to the identified behavioral and mental health concerns of an individual or group of children including providing special help to children with atypical behavior?**

1304.24(a)(3)(i)

1304.24(a)(3)(iii)

Document Review:

- Do program plans/documents describe a systematic approach to addressing mental health that clearly communicates to staff and parents what services are available and how to access them? Is there a system in place for mental health screenings and assessment? Is there a system of referral and follow-up that incorporates the mental health needs of infants and toddlers?

Are there reports from the mental health professional, based on observations of classroom/home visiting practices that provide mental health guidance for staff/parents on improving mental health practices?

- Are there contingency plans for addressing mental health issues associated with traumatic events affecting the program, for enrolled families, or in the wider community? Are their contingency plans for psychiatric emergencies for i.e., child/adult threatening or attempting to harm self or others?
- Do IEPs/IFSPs include behavioral/mental health services for children with disabilities who have these needs?
- Review any individualized plans or reports related to mental health or behavioral concern for a child and/or group of children (this may include behavior or treatment plans, report recommendations, classroom charts, individualized visual schedules, etc.).

Interview:

- Interview staff to identify the process for screening and assessment of the mental health needs of individual children.
 - How would you request and receive mental health consultation on child guidance techniques for a child with identified concerns?
 - Do staff and parents understand and recognize the interconnectedness of adult and infant/toddler mental health?
 - How does the mental health professional solicit and share ideas on how to address children's mental health needs (with staff and parents)?

- For a child who has been identified as needing individualized mental health / behavioral services:
 - Have you received training, extra supervision, mental health consultation on addressing the mental health/behavioral needs of this child? Describe this. Was it helpful? Adequate? Describe the family involvement. What is the record-keeping system for referrals and tracking provision of services? Who follows-up on referrals?

Observation:

- Observe children and teacher's behaviors to note any relevant evidence of program practices that are responsive or not responsive to the behavioral or mental health needs of the children.
- If possible observe any consultation between the mental health professional and parents and/or staff. Note any evidence of parent and staff providing input into the design or implementation of mental health services. Note evidence of parents or staff sharing their concerns with the mental health professional.

5. Special Help for Children's Individualized Mental Health Needs

How does the grantee ensure that parents, program staff, and the mental health professional design and implement program practices that are responsive to the identified behavioral and mental health concerns of an individual or group of children including providing special help to children with atypical behavior?

	Suggested Sources	Actual Sources
Documents Reviewed	Program service plan Reports from mental health professional Contingency plan for addressing mental health issues IEP/IFSP Individualized plans	
Persons Interviewed	Program staff Parents	
Program Services Observed	Children and teacher's behaviors If possible, consultation between mental health professional and parents and/or staff	

Relevant Regulation (1304.24(a)(3)(i))

1304.24 Child mental health. (a) Mental health services (3) Mental health program services must include a regular schedule of on-site mental health consultation involving the mental health professional, program staff, and parents on how to: (i) Design and implement program practices responsive to the identified behavioral and mental health concerns of an individual child or group of children;

Mental Health Services Monitoring Reference Sheet

As a member of the PRISM Review team, you can get important information on mental health services from fellow reviewers. The following references to mental health services are contained in other Core Questions (nearly verbatim).

Mental Health Services Protocol	Other PRISM Activity
1. <u>Program Planning and Management for Quality Mental Health Services</u>	<p><u>Planning Q2</u> How effective is the grantee's ongoing system of program planning in supporting the implementation of quality services to children and families? How does the system ensure:</p> <ul style="list-style-type: none"> written plan(s) for implementing quality services for children and families, and supporting pregnant women as appropriate, that result in positive outcomes and are reviewed, revised, and updated as needed? <p><u>Communication Q3</u> How effective is the grantee's communication system in supporting the implementation of quality services to children and families? How does the system ensure:</p> <ul style="list-style-type: none"> effective communication between staff and parents, carried out on a regular basis throughout the program year and in the primary or preferred language of the parents? required information is shared among staff (e.g., program plans...)? strong communication, cooperation, and information sharing among agencies and their community partners? regular communication among all staff?

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Mental Health Services Protocol	Other PRISM Activity
<p>1. <u>Program Planning and Management for Quality Mental Health Services</u></p>	<p><u>Record-Keeping and Reporting Q4</u> How efficient and effective are the record-keeping and reporting systems in providing accurate, confidential, and timely information regarding children, families, and staff and in supporting quality services? How are the record-keeping and reporting systems used to manage data and generate status reports that:</p> <ul style="list-style-type: none"> • identify and report program progress toward goals and objectives, and result in revised plans for the implementation of services as necessary? • provide information on preschool children's progress? • control program quality and maintain program accountability? <p><u>Ongoing Monitoring Q5</u> How effective is the grantee's ongoing monitoring system in supporting the implementation of quality services to children and families? How does the system ensure:</p> <ul style="list-style-type: none"> • ongoing monitoring to ensure tracking of patterns of progress and accomplishments for groups of children in learning and development, as well as in health and disabilities services and family and community partnerships? <p><u>Self-Assessment Q6</u> How effective is the grantee's approach to self-assessment in supporting the implementation of quality services to children and families? How does the system ensure that:</p> <ul style="list-style-type: none"> • the self-assessment examines the effectiveness and progress in meeting the grantee's goals and objectives and the implementation of Federal regulations? and families?

<i>continued from previous page</i>	
Mental Health Services Protocol	Other PRISM Activity
<p>1. <u>Program Planning and Management for Quality Mental Health Services</u></p>	<ul style="list-style-type: none"> the grantee analyzes the results of the self-assessment and uses the information to address continuous improvement and to inform the grantee's planning process? <p><u>Human Resources Q7</u> How effective is the grantee's human resources management system in supporting the implementation of quality services to children and families? How does the system ensure that:</p> <ul style="list-style-type: none"> all required functions (e.g. content area experts, etc.) are appropriately assigned? there are adequate provisions for staff supervision and support, including annual performance appraisals? all staff are qualified for their positions? services for children meet the staffing requirements set out in the Performance Standards? the training and development system provides a structured approach to assisting staff, governing body members, Policy Council members, and volunteers in acquiring or increasing the knowledge and skills needed to fulfill their job? <p><u>Fiscal Management Q8</u> How effective is the fiscal management system in supporting the implementation of quality services to children and families? How does the system ensure that:</p> <ul style="list-style-type: none"> the budget is developed and approved to support program goals and objectives? status reports reflect the appropriate use of funds to support quality services?

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Mental Health Services Protocol	Other PRISM Activity
<p>1. <u>Program Planning and Management for Quality Mental Health Services</u></p>	<p><u>Prevention and Early Intervention Q9A</u> How does the grantee implement a comprehensive system of services for preventing health problems, and intervening promptly when they exist? How does the grantee ensure that:</p> <ul style="list-style-type: none"> • a regular schedule of on-site consultation by a mental health professional supports parent and staff efforts to address children's needs in a timely manner? <p><u>Community Partnerships Q16</u> How does the grantee take an active role in community planning and advocacy to improve the delivery of services to children and families? How does the grantee:</p> <ul style="list-style-type: none"> • develop community partnerships, supported by interagency agreements, as appropriate? • establish collaboration within the grantee agency and across agencies?
<p>2. <u>Early Identification of Children's Mental Health Needs</u></p>	<p><u>Prevention and Early Intervention Q9A</u> How does the grantee implement a comprehensive system of services for preventing health problems, and intervening promptly when they exist? How does the grantee ensure that:</p> <ul style="list-style-type: none"> • Developmental screening plays a role in child development and health services planning for children?

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Mental Health Services Protocol	Other PRISM Activity
<p>2. <u>Early Identification of Children's Mental Health Needs</u></p>	<p><u>Managing Health and Nutrition Services Q9B</u> How does the grantee effectively manage health and nutrition services, including tracking of all child health and developmental services to ensure that follow-up services are received in a timely manner? How does the grantee ensure that:</p> <ul style="list-style-type: none"> mechanisms are in place that support communication among staff, parents, and community providers to assure follow-up services are received, while maintaining confidentiality standards? <p><u>Individualization Q10</u> How does the grantee individualize the program of child development and health services to meet each child's unique characteristics, strengths, and needs, as determined in consultation with the family? How does the grantee ensure that:</p> <ul style="list-style-type: none"> individualization is based on the results of ongoing child assessment linked to curriculum goals and reflected in the program's curriculum, planning, record-keeping, and family partnership process? <p><u>Curriculum and Assessment Q13</u> How has the grantee engaged in a process of curriculum selection and/or development, implementation, and evaluation resulting in a written plan that supports the growth of children's social competence, including school readiness, for each identified program option?</p>

<i>continued from previous page</i>	
Mental Health Services Protocol	Other PRISM Activity
<p>2. <u>Early Identification of Children's Mental Health Needs</u></p>	<p><u>Curriculum and Assessment Q13</u> How has the grantee engaged in a process of curriculum selection and/or development, implementation, and evaluation resulting in a written plan that supports the growth of children's social competence, including school readiness, for each identified program option? How does the grantee ensure that:</p> <ul style="list-style-type: none"> the written curriculum includes (a) goals for children's development and learning; (b) the experiences through which children will achieve these goals; (c) what staff and parents can do to help children achieve these goals; (d) the materials needed to support the implementation of the curriculum towards achieving the stated goals; and (e) consistency with the Performance Standards and sound child development principles?
<p>3. <u>Parent Involvement in Children's Mental Health</u></p>	<p><u>Prevention and Early Intervention Q9A</u> How does the grantee implement a comprehensive system of services for preventing health problems, and intervening promptly when they exist? How does the grantee ensure that:</p> <ul style="list-style-type: none"> parents are involved as full partners in prevention and early intervention?

<i>continued from previous page</i>	
Mental Health Services Protocol	Other PRISM Activity
3. <u>Parent Involvement in Children's Mental Health</u>	<p><u>Parent Involvement Q15</u> How does the grantee provide parent involvement opportunities? How does the grantee ensure that:</p> <ul style="list-style-type: none"> • parents are involved in the development of the program of services for children, including home visits; parent conferences; the delivery of health care services to children; the development of the curriculum; planning, implementing, and evaluating nutrition services; and developing and implementing services for children with disabilities? • parents have the opportunities to enhance their skills and knowledge in the following areas: <ul style="list-style-type: none"> • medical, dental, mental health and nutrition (encouraging parents to become active partners in their child's health care process and learn the principles of preventive health and safety)?
4. <u>Mental Health Education and Intervention for Parents</u>	<p><u>Prevention and Early Intervention Q9A</u> How does the grantee implement a comprehensive system of services for preventing health problems, and intervening promptly when they exist? How does the grantee ensure that:</p> <ul style="list-style-type: none"> • pregnant women enrolled in EHS are assisted in accessing prenatal and postpartum care and are provided with prenatal education?

<i>continued from previous page</i>	
Mental Health Services Protocol	Other PRISM Activity
<p>4. <u>Mental Health Education and Intervention for Parents</u></p>	<p><u>Curriculum and Assessment Q13</u> How has the grantee engaged in a process of curriculum selection and/or development, implementation, and evaluation resulting in a written plan that supports the growth of children's social competence, including school readiness, for each identified program option? How does the grantee ensure that:</p> <ul style="list-style-type: none"> • parents are involved in curriculum implementation and reporting child progress? <p><u>Family Partnership Building Q14</u> How does the grantee engage in a process of collaborative partnership building with parents? How does the grantee ensure that:</p> <ul style="list-style-type: none"> • staff work with families throughout the year to identify family goals, strengths, and necessary services and supports, and to describe progress in achieving family goals? • staff work with parents to identify and access services and resources responsive to their interests and goals, and follow up with them to ensure that the referrals met their expectations and circumstances? • for programs that enroll pregnant women, infants, and toddlers, assistance is available to mothers in accessing comprehensive prenatal and postpartum care?

<i>continued from previous page</i>	
Mental Health Services Protocol	Other PRISM Activity
4. <u>Mental Health Education and Intervention for Parents</u>	<p><u>Parent Involvement Q15</u> How does the grantee ensure that: parents have opportunities to enhance their skills and knowledge in the following areas:</p> <ul style="list-style-type: none"> • knowledge of child growth and development, the program's curriculum, the child assessment process, and parent skills? <p><u>Community Partnerships Q16</u> How does the grantee take an active role in community planning and advocacy to improve the delivery of services to children and families? How does the grantee:</p> <ul style="list-style-type: none"> • promote the access of children, families, and pregnant women, as appropriate, to community services that are responsive to their needs, such as child care?
5. <u>Special Help for Children's Individualized Mental Health Needs</u>	<p><u>Prevention and Early Intervention Q9A</u> How does the grantee implement a comprehensive system of services for preventing health problems, and intervening promptly when they exist? How does the grantee ensure that:</p> <ul style="list-style-type: none"> • a regular schedule of on-site consultation by a mental health professional supports parent and staff efforts to address children's needs in a timely manner?

<i>continued from previous page</i>	
Mental Health Services Protocol	Other PRISM Activity
<p>5. <u>Special Help for Children's Individualized Mental Health Needs</u></p>	<p><u>Disabilities Services Q12</u> How does the grantee ensure that individualized services are effectively provided to children with diagnosed or suspected disabilities?</p> <ul style="list-style-type: none"> • ensure the timely assessment of special education/related services needs of children with disabilities, conducted in coordination with the Part C agency and/or LEA? • provide parents with information and assistance in understanding and advocating for services and support needed to address their child's special needs? • provide staff with the information, guidance, and resources needed to help children and families meet the individualized goals and objectives in the IFSP/IEP? • modify activities; remove barriers; and provide support, as needed, for inclusion of children with disabilities in the full range of program activities?

Other PRISM Activities with Relevant References for Mental Health Services

As a member of the PRISM Review team, you can get important information on mental health services from fellow reviewers. The following references to mental health services are contained in other Core Questions (nearly verbatim).

Focus Children

Review focus children's files to note mental health-related items, such as: developmental screening; behavioral, social, and/or emotional concerns; mental health history and observations; family functioning and input, etc.

Transportation Services Checklist

19. Appropriate staff is informed of any health or safety accommodations or adaptations needed for children in accordance with the program's confidentiality policy. [1304.22(b)(3)]

Classroom, Family, Child Care, or Socialization Experience Observation Instrument

Interview Questions

- o How do you integrate issues of health, nutrition, and mental health into the curriculum...?
- o What developmental screening tool do you use...?
- o How often do you assess children...? How do you communicate this information to his/her parent?

1. Teacher Interactions and Strategies
 - positive child guidance and appropriate limits
2. Facilitating Children's Language and Literacy Development
 - language use and interaction among children and adults
 - adult's fostering children's communication, including home language
 - experiences that support creative expression
4. Facilitating Children's Social and Emotional Development
 - experiences that foster independence and trust;
 - age-appropriate expectations of children;
 - adults interacting in supportive ways;
 - experiences that help children develop social skills, competence, respect for others, and positive attitudes towards learning.
6. Prevention and Early Intervention Integrating Health, Nutrition, Mental Health, Safety and Wellness
 - health, nutrition, and mental health integrated into routines and children's learning experiences
7. Individualizing and Disabilities Services
 - adults observing and assessing children's behavior and progress

Home Visit Observation Instrument

- Interview Questions
 - o How do you integrate issues of health, nutrition, and mental health into the curriculum...?
 - o What developmental screening tool do you use...?
 - o Describe your process for the ongoing assessment of children.
 - o How do you use the results from the assessment to help you in planning?
 - o How do you communicate with the child's parents about their child's progress?

- 1. Home Visit Interactions and Strategies

How does the home visitor:

 - demonstrate a friendly and cooperative relationship with the family?
 - help parents improve their parenting skills?
 - plan home visits with parents to incorporate all services of the HS program?

- 4. Facilitating Children's Social and Emotional Development

How do the home visits help parents:

 - provide experiences that foster independence?
 - develop age-appropriate expectations of children?
 - interact in supportive ways?
 - help children develop social skills, respect for others, and friendships?
 - help children feel successful, competent and positive toward learning?

- 6. Curriculum: Prevention and Early Intervention Integrating Health, Nutrition, Mental Health, Safety, and Wellness

How does the home visitor help parents:

 - ensure a safe environment?
 - promote health, nutrition, and wellness?

- 7. Curriculum: Individualizing and Disabilities Services

How do the home visitor and parent:

 - plan and implement experiences that match the child's current developmental level?
 - understand ways to adapt or change activities for the child?
 - Identify, select, and use toys, books, and other materials that match the child's interests and abilities?

- 8. Family Partnerships

How does the home visitor:

 - support positive relationships?
 - support parents in progress towards their goals?



What's New for FY 2006 Interview Guides

The Interviewer Guides, referred to as "interview protocols" in FY2005, have been revised to eliminate references to the Headstart Act, as appropriate. Those guides identified as optional in FY 2005 have been eliminated from the FY 2006 PRISM Instrument. The sign-in sheets have been revised to reflect this change.

Sign-In sheets include: (1) a **General Sign-In Sheet** for all interviews (with the exception of the Policy Council and Family Group Interviews); and (2) a **Policy Council and Family Group Interview Sign-In Sheet**, which contains space for participants to include more detailed information about themselves and their enrolled child(ren).

More detailed guidelines on functionality and process for the sign-in sheets appear in the "Sign-In Sheet Instructions" located immediately after this section.

SIGN-IN SHEET INSTRUCTIONS

General Sign-In Sheet

A blank General Sign-In Sheet, for use in documenting interview and meeting participants, appears immediately following this instructions page. This sign-in sheet should be used for any of the formal interviews (excluding the Policy Council and Family Group Interviews, which have their own sign-in sheets), the Entrance Meeting, and any other meeting or interview, as applicable. There are areas on the sheet to write in the program name, date, time, name of notetaker, and name of facilitator, and to identify the interview or meeting being conducted. The second half of the sheet allows space for each participant to include his or her name, title, and agency. Please note that this sign-in sheet contains lines for ten participants to sign-in. However, if there are more than ten participants, you may copy the blank form and use those copies for any additional participants.

Policy Council and Family Group Interview Sign-In Sheet

A blank Policy Council and Family Group Interview Sign-In Sheet, for use in documenting interview participants, appears in this section following the General Sign-In Sheet. This sign-in sheet should be used for the Policy Council Interview, Family Group Interview, and any other meeting or interview, as applicable. There are areas on the sheet to write in the program name, date, time, name of note taker, and name of facilitator, as well as indicate the interview or meeting being conducted. The second half of the sheet allows space for participants to sign-in and note important information that will be valuable for the review team during and after the interview. Each participant should include his or her name, the children's names enrolled in Head Start/Early Head Start, the name of the center and classroom (if applicable) for each enrolled child, the type of program option (e.g., Head Start or Early Head Start; center or home-based; full or part day) in which each child is participating, and the participant's position on Policy Council, if applicable. Please note that this sign-in sheet contains lines for ten participants to sign-in. However, if there are more than ten participants, you may copy the blank form and use those copies for any additional participants.

General Sign-In Sheet

Program _____ **Date** _____ **Time** _____

Notetaker _____ **Facilitator** _____

Indicate Interview by [X]:

- ☐ Entrance Meeting
- ☐ Child Care Partnerships
- ☐ Community Partnerships
- ☐ Governing Body
- ☐ Other (Specify)

Name		Title	Agency
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

Policy Council and Family Group Interview Sign-In Sheet

Program _____ **Date** _____ **Time** _____

Notetaker _____ **Facilitator** _____

Indicate Interview by [X]:

- ☐ Family Group Interview
- ☐ Policy Council Interview

	Your Name	Name(s) of Your Child/Children in Head Start	Center	Classroom (if Applicable)	Program Option (e.g., HS or EHS, Center or Home-Based, Full or Part Day)	Your Position on Policy Council (if applicable)
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						



Entrance Meeting

PURPOSE

- To provide an opportunity for the team leader to make some general comments about the course of the review; and
- To provide an opportunity for team members and Head Start staff to meet one another.

LOGISTICS

- **Content:** The entrance meeting includes two activities: an entrance session for general comments and introductions and logistics coordination.
- **Duration:** The entrance meeting lasts no more than one hour.
- **Review team participants:** All review team members must attend.
- **Grantee participants:** Any grantee staff designated by the grantee may attend.



Family Group Interview Guide

PURPOSE

- To continue to clarify reviewers' understanding of the grantee's systems and services as seen through focus families' experiences in Head Start/Early Head Start.

LOGISTICS

- **Duration:** The interview lasts no more than 2 hours. It is scheduled after reviewers have had an opportunity to observe children and talk with staff, and when it is convenient for most focus parents to attend.
- **Review team participants:** At least two reviewers, preferably a child development and health services reviewer and a family and community partnerships reviewer, are present for the Family Group Interview—one to facilitate the discussion, the other to serve as notetaker. All service reviewers attend when possible.
- **Grantee participants:** All parents from focus families are invited to attend. Reviewers should make every effort to use alternative means to talk with focus parents who are unable to attend.
- **Group size:** If there are more than 20 focus families, consider dividing them into smaller groups. A group size of 10–12 is recommended.

INTRODUCTION

Today I would like to talk with you about your experiences with Head Start/Early Head Start. My goal is to learn how Head Start/Early Head Start has worked with families and children, including things that have worked well and those areas in which you would like to see some improvement. We are here to work in partnership with the grantee to help make the program the best it can be.

We know that everyone's experience with Head Start/Early Head Start is different, and we appreciate the opportunity to talk with you about your experiences. We would just like to get a good picture of what the program has been like for you and your children. Let's start with introductions. Tell us your name, your child's name and age, what center or program option your child is enrolled in, how long you've been involved in the program, and one thing that your child has learned in Head Start/Early Head Start.

Recruitment and Enrollment

1. Tell me how you found out about Head Start/Early Head Start and what it was like for you to get into Head Start/Early Head Start.

Listen for:

- communication with families about Head Start/Early Head Start philosophy;
- assistance to parents during the application process;
- communication in parents' preferred language;
- when applicable, parental choice of program option; and
- various methods through which parents learned about the program.

Family Partnership Building

2. In Head Start/Early Head Start we talk about the child and his/her family. Tell me about ways in which Head Start/Early Head Start has been supportive of the goals you have for your family, your child, and yourself.

Listen for:

- family-identified goals and program support for the goals;
- referrals and follow-up;
- interactions with families that acknowledge strengths and respect diversity and cultural background; and

- assistance to parents in learning advocacy skills.
3. Talk about how the program helps you prepare for your child's transition from Early Head Start to Head Start or from Head Start to public school.

Listen for:

- parent involvement in the transition process.
4. Tell me about the ways that you are involved in Head Start/Early Head Start and about what happens in your child's classroom.

Listen for:

- individual, as well as group activities;
- a variety of program activities;
- efforts to conduct these activities in ways respectful of the various languages spoken by families; and
- a variety of strategies for making contact with families.

Prevention and Early Intervention/Follow-up Services

5. How does Head Start/Early Head Start work with you to make sure that your child has good health care and is developing well?

Listen for:

- parents becoming active partners in their child's health care;
- links to ongoing accessible health care;
- ongoing communication about health issues; and
- referrals and follow-up for children with health problems or disabilities.

Curriculum, Assessment, and Individualization

6. Talk with me about the kinds of things your child is learning in the classroom. What kinds of things do you and your child's teacher talk about? Do you get a report that keeps you informed of your child's progress and accomplishments?

Listen for:

- information on how parents have input into the curriculum;

- a curriculum reflective of family cultures;
- families that participate in setting goals for their children;
- staff that address children's strengths and needs; and
- frequency of home visits and conferences.

Disabilities

7. Are you aware that your Head Start/Early Head Start program is serving children with disabilities? What have you seen teachers and staff do to support and involve those children and their families?

Listen for:

- parents who think children with disabilities are getting necessary services;
- assistance to parents in communicating concerns and preferences to multidisciplinary teams;
- involvement in development of IFSP/IEPs; and
- coordination with other agencies.

Community Partnerships

8. How has Head Start/Early Head Start helped you connect with other community services and resources?

Listen for:

- referrals to appropriate community agencies;
- access to programs for developing literacy skills, vocational skills, parenting skills, and advocacy and communication skills;
- assistance to pregnant women in accessing comprehensive prenatal and postpartum care; and
- examples of partnerships with other child care agencies and providers.

Program Governance

9. What opportunities do you have to discuss ideas or concerns you have about the program with other parents and staff?

Listen for:

- participation in Parent Committees;
- knowledge of work done by Policy Council/Policy Committee;
- examples of ideas or concerns that parents have taken to Parent Committees or policy groups; and
- inclusion of parents from Early Head Start and all program options in policy groups.

Facilities, Materials, Equipment, and Transportation

10. Talk with me about Head Start/Early Head Start buildings and the equipment and materials you have seen in the classrooms. Tell us about any transportation services that your child receives from the program.

Listen for:

- safe facilities and transportation services; and
- appropriate and adequate materials.

CONCLUSION

Please share with us anything that you really like about Head Start/Early Head Start and want to see continue, as well as anything you would like to see changed or handled differently within Head Start/Early Head Start or your children's classrooms.

Thank you very much for taking the time to talk with us today.



Child Care Partnerships Interview Guide

PURPOSE

- To understand the development, implementation, and future direction of the grantee's child care partnerships.

LOGISTICS

- **Duration:** The interview lasts from a half hour to 1 hour.
- **Review team participants:** At a minimum, a Systems Reviewer and a Service Reviewer conduct the interviews. The Systems Reviewer listens for issues of planning, communication, record-keeping, staff qualifications and training, ongoing monitoring, and fiscal management. The Service Reviewer listens for information about how services are delivered to children and families.
- **Child care partnership participants:** This interview is for directors or other lead staff members from child care programs that receive funds or resources from Head Start to serve children who are counted as "Head Start/Early Head Start" children.
- **Group size:** This interview may be done individually or with a group. If done in a group, a group size of 10–12 is recommended.

OPTION

This interview guide may be combined with the Community Partnerships Interview Guide, at the discretion of the team leader.

INTRODUCTION

I would like to talk with you about your experiences in partnering with Head Start/Early Head Start. My goal is to learn how Head Start/Early Head Start has worked with your agency, including things that have worked well and those areas in which you would like to see some improvement. We are here to work in partnership with the Head Start/Early Head Start grantee to help make the program the best it can be. There are no “wrong answers” here. We would just like to get a good picture of what the partnership is like.

Background and Nature of the Partnership

1. Tell me about the development of the partnership you have with this Head Start/Early Head Start program.

Listen for:

- history of the partnership;
- goals for the partnership; and
- shared planning.

2. Describe your agreement for this partnership.

Listen for:

- the responsibilities of each organization;
- the form of the agreement (written or verbal); and
- financial arrangements.

3. Describe the relationship between your agency’s governing body or board (if any) and Head Start/Early Head Start’s governing body.

Listen for:

- interaction between governing bodies; and
- the nature of the interaction.

4. Describe how communication occurs between your organizations.

Listen for:

- types of information shared;

- strategies used for communicating; and
 - procedures for addressing confidentiality.
5. Describe some activities conducted by you and/or the Head Start/Early Head Start program to ensure quality services.

Listen for:

- knowledge of Performance Standards and other regulations;
 - oversight and support from the Head Start/Early Head Start agency;
 - participation in program self-assessment;
 - ongoing monitoring to ensure that Performance Standards and other regulations are met; and
 - opportunities for staff development.
6. What do you see as the major effects of this partnership?

Listen for:

- strengths of the partnership;
- impact on service delivery, including classroom activities, health services, and services to children with disabilities and families; and
- challenges.

Future Direction

7. What are the “next steps” in your partnership with Head Start/Early Head Start?



Community Partnerships Interview Guide

PURPOSE

- To understand the development, implementation, and future direction of the agency's community partnerships.

LOGISTICS

- **Duration:** The interview lasts no more than 1 hour. This interview may be used in conjunction with or instead of the Child Care Partnerships Interview.
- **Review team participants:** The team leader decides which reviewers conduct this interview. At a minimum, two reviewers, a Systems Reviewer and a Family and Community Partnerships Reviewer, attend the meeting. One reviewer facilitates, the other takes notes. Background information for this interview will be provided in the completed Community Partnerships Information Form and should be reviewed by the reviewers conducting this interview prior to meeting with the community partners.
- **Community partner participants:** This interview involves directors or other lead staff members from community agencies that are partners with Head Start/Early Head Start. Appropriate attendees may include directors from social services, mental health, LEAs, Part C agencies, health care providers, and other community partners.
- **Group size:** The interview may be done individually with a single partner agency or with a group representing several partners. A group of no more than 10–12 is recommended.

OPTION

This interview guide may be combined with the Child Care Partnerships Interview Guide, at the discretion of the team leader.

INTRODUCTION

Today we would like to talk with you about your experiences with Head Start/Early Head Start. Our goal is to learn how Head Start/Early Head Start has worked with your agency, including things that have worked well and those areas in which you would like to see some improvement. There are no “wrong answers” here. We would like to have a picture of how the partnership works. You have already filled out a form describing your role in the community and the nature of your relationship with this Head Start/Early Head Start program. We would like to focus our discussion today on the outcomes of that partnership.

1. What do you see as the major effects of your partnership with Head Start/Early Head Start?

Listen for:

- the effect on service delivery and access to resources for families, and
 - accomplishments that meet community needs.
2. For members of the Health Services Advisory Committee: How long have you been a member of the Health Services Advisory Committee? What sorts of issues has the Committee addressed this year?
 3. For LEAs or Part C agencies: How do you work with Head Start/Early Head Start to support children with disabilities? What arrangements do you have to assist children and families in their transition from Head Start/Early Head Start?

Future Direction

4. What are the “next steps” in your partnership with Head Start/Early Head Start?



Policy Council Interview Guide

PURPOSE

- To obtain information on how the grantee is engaged in shared decision-making with parents and community representatives on the Policy Council.

LOGISTICS

- **Duration:** The interview lasts no longer than 30 minutes.
- **Review team participation:** At a minimum, two reviewers, a Systems Reviewer and a family and community partnerships reviewer, attend the Policy Council meeting and conduct the interview. One reviewer facilitates; the other takes notes.
- **Grantee participation:** Policy Council members are invited to take part in the interview after the Policy Council meeting. Depending upon member availability after the meeting, a group interview may not be possible. In such a case, individual interviews with Policy Council members at other times during the review may be necessary.
- **Group size:** A group of no more than 10–12 is recommended.

INTRODUCTION

Thank you for letting us sit in during your Policy Council meeting. We learned some important things about program governance in your organization. Now we'd like to ask some additional questions to help us understand how your Policy Council works.

Policy Council Composition and Background

1. Tell us how you became a member of the Policy Council.

Listen for:

- election process.

2. Tell us about the Policy Council. How many people are on it? Whom do they represent?

Listen for:

- representation from Early Head Start/Early Head Start and all program options;
- length of service on the Policy Council;
- selection of community representatives; and
- program support of Policy Council.

Functions of Policy Council

3. Was this meeting typical? In what ways? In what ways was it not typical?

Listen for:

- description of typical agenda items.

4. What kinds of things does the Policy Council do? Can someone describe a recent activity or project?

Listen for:

- approval of recruitment areas, program options, and program design;
- involvement in the grant application and budget process, program planning, personnel decisions; and
- involvement in the program's self-assessment process.

5. Describe any training that Head Start/Early Head Start has offered to you this year and last year.

Listen for:

- training on program governance, including roles and responsibilities of Policy Council members.

6. What kinds of information or documents does the agency provide to the Policy Council? What is the process of dealing with these?

Listen for:

- copies of program plans and policies;
- financial reports; and
- relevant information from Head Start/Early Head Start.

7. What is the process for communicating with the governing body?

Listen for:

- ongoing communication; and
- procedures for resolving disputes.

8. How does the Policy Council communicate with parents?

Listen for:

- opportunities for parents to express ideas and opinions to the Policy Council;
- Policy Council encouragement of parent involvement; and
- availability of child care and transportation for parents involved in Policy Council meetings.



Governing Body Interview Guide

PURPOSE

- To describe how the governing body exercises its oversight responsibility and ensures accountability; and
- To describe how the governing body is knowledgeable about the Head Start/Early Head Start Program.

LOGISTICS

- **Duration:** The interview lasts no more than 30 minutes.
- **Review team participants:** The team leader determines which reviewers attend this interview. Generally, a Systems Reviewer leads this interview. Other available staff may attend, and one takes notes.
- **Agency participants:** Members of the agency's governing body are involved. This interview may be conducted in a group setting or with individual governing body members during the review.
- **Group size:** A group of no more than 10-12 is recommended.

INTRODUCTION

Thank you for taking time to talk with me about your role as a member of the governing body for Head Start/Early Head Start. We are interested in finding out just what the role of the governing body is for this grantee. First, we'll talk about how the governing body is involved in the grantee's overall planning process. Then, we'll discuss how the governing body exercises oversight and maintains accountability.

Planning and Communication

1. How do you learn what's expected of you as a member of the governing body in the Head Start/Early Head Start program?

Listen for:

- written policies that define the roles and responsibilities of governing body members; and
- appropriate involvement in the grant application and budget process, program planning, personnel decisions, self-assessment, and selection of delegate agencies (if applicable).

2. Describe your ongoing working relationship and communication process with the Head Start policy group.

Listen for:

- examples of recent projects and communication;
- reports; and
- satisfaction with the relationship.

3. How and when are you and the policy group involved in the grantee's planning process? How are the timeframes and procedures for planning established?

Listen for:

- development of program goals and objectives.

4. How do you ensure that the policy group has had an opportunity to act on items that must be decided through shared decision-making, such as new hires or terminations?

Listen for:

- communication with Head Start/Early Head Start management staff.

5. What role do you and the policy group play in the self-assessment process?

Listen for:

- examples of activities conducted during most recent self-assessment; and
- use of self-assessment results.

6. How does prior consultation occur on “must approve” issues before those issues are acted on by the full governing body? For example, how was the grant application presented to you? How did the process of approval work?

Listen for:

- examples of decisions approved during past year; and
- satisfaction with the process.

7. How does the governing body (and policy group) participate in decisions about seeking new funding?

Listen for:

- description of the process used; and
- satisfaction with the process.

Program Governance

8. What role does the governing body play in establishing or changing the composition of the policy group? In selecting community representatives?

Listen for:

- familiarity with the composition of the policy group; and
- description of selection process.

9. What reporting is provided to you and the policy group to keep you informed about progress, problems, or changes needed in the program?

Listen for:

- types of reports received.

10. Do you currently receive reports describing patterns of progress and accomplishments for groups of children, i.e., child outcomes data?

Listen for:

- familiarity with the child outcomes initiative.

11. How do you exercise oversight and ensure accountability for program outcomes and fiscal integrity?

Listen for:

- communication with appropriate program staff; and
- reporting process.

12. What written impasse procedures are in place? How were the policies developed?

Listen for:

- description of the procedures; and
- process used to develop them.



Health and Safety Checklist

Classrooms/Centers Observed

- A. _____
- B. _____
- C. _____
- D. _____

This observation form will help you to record your observations regarding a number of health and safety issues. Items are not intended to be an exhaustive list of Performance Standards related to health and safety, but rather items that can be rated according to a "checklist" format.

This tool is intended to assist in answering Core Question #17 on Facilities, Materials, Equipment, and Transportation and Core Question #9a on Prevention and Early Intervention. In addition, information from this form may be useful

to reviewers in other areas related to child development and health services. In order to obtain a complete picture of facilities and health and safety issues in the agency, it will be necessary to combine information from this instrument with information obtained from other observations and interviews.

Please indicate whether the item is supported by observations by checking "yes" or "no" for each item under the appropriate center and/or classroom (space has been provided at the top

of each page for you to indicate multiple center or classroom names). In addition, at the end of each section, space is provided for comments and observations in each area. Please use this page to describe any problems or concerns that you witnessed in the observation or to explain instances where items were not observed.

HEALTH AND SAFETY CHECKLIST

A.		B.		C.		D.	
Yes	No	Yes	No	Yes	No	Yes	No

Area #1: Classrooms**Infant/Toddler**

1. Sanitation and hygiene procedures for diapering have been adopted that adequately protect the health and safety of children served by the program and staff. [1304.22(e)(5)]
2. The diaper-changing area is located away from areas used for cooking, eating, or children's activities. [1304.53(a)(10)(xiv)]
3. Diapers are disposed of in a safe and sanitary manner. [1304.53(a)(10)(xvi)]
4. Infant sleeping arrangements use firm mattresses and avoid soft bedding materials, such as comforters, pillows, fluffy blankets, or stuffed toys. [1304.53(b)(3)]
5. Cribs are at least 3 feet apart from each other. [1304.22(e)(7)]
6. Infant toys are made of nontoxic materials and are sanitized regularly. [1304.53(b)(2)]
7. Toilet training equipment is available for children being toilet trained. [1304.53(a)(10)(xv)]

Comments:

Area #1: Classrooms (continued)

[illegible]

1. Nonporous gloves are available for use when dealing with bloody bodily fluids. [1304.22(e)(3)]
2. Staff promote effective dental hygiene among children in conjunction with meals. [1304.23(b)(3)]
3. Toys are stored in a “safe and orderly fashion” (e.g., in their assigned places, not out where people can trip over them). [1304.53(b)(1)(vii)]
4. The indoor and outdoor space for infants and toddlers is separated from general walkways and areas used by preschoolers. [1304.53(a)(4)]
5. Toys, materials, and furniture are safe, durable, and in good condition (e.g., materials free of sharp edges and loose pieces, balloons and/or plastic bags not used, no choking hazards). [1304.53(b)(1)(vi)]
6. Center space is organized into functional areas that can be recognized by children and that allow for individual activities and social interactions. [1304.53(a)(3)]
7. Staffing patterns support regulations regarding class size and number of adults per class. [1306.20]
8. Staff, volunteers, and children wash their hands with soap and running water after diapering or toilet use, before food-related activities, whenever hands are contaminated with blood or other bodily fluids, and after handling pets or other animals. Staff and volunteers also wash their hands with soap and running water before and after giving medications, before and after treating or bandaging a wound, and after assisting a child with toilet use. [1304.22(e)(1)–(2)]

Comments:

HEALTH AND SAFETY CHECKLIST

Area #2: Indoor Facilities**Sanitation/Hygiene**

A.		B.		C.		D.	
Yes	No	Yes	No	Yes	No	Yes	No

1. Facilities are available for the proper storage and handling of breast milk and formula. [1304.23(e)(2)]
2. Bathroom facilities are clean, in good repair, and easily reached by children. [1304.53(a)(10)(xiv)]
3. Bathroom facilities are separated from areas used for cooking, eating, or children's activities. [1304.53(a)(10)(xiv)]
4. Indoor and outdoor premises are cleaned daily and kept free of undesirable and hazardous materials and conditions. [1304.53(a)(10)(viii)]
5. Garbage and trash are stored and disposed of in a safe, sanitary manner. [1304.53(a)(10)(xvi)]
6. A utility sink is specifically used to clean potties. [1304.22(e)(6)]

Comments:

HEALTH AND SAFETY CHECKLIST

Area #2: Indoor Facilities (continued)

Safety

A.		B.		C.		D.	
Yes	No	Yes	No	Yes	No	Yes	No

1. The facility has approved, working fire extinguishers and an appropriate number of smoke detectors that are tested regularly. [1304.53(a)(10)(v), 1304.53(a)(10)(vi)]
2. Windows and glass doors are constructed, adapted, or adjusted to prevent injury to children. [1304.53(a)(10)(xii)]
3. Electrical plugs accessible to children are covered. [1304.53(a)(10)(xi)]
4. The heating/cooling system is insulated to protect children and staff from potential burns. (Note: Look at pipes and/or radiators.) [1304.53(a)(10)(i)]
5. There is an absence of highly flammable furnishings, decorations, or materials that emit toxic fumes. [1304.53(a)(10)(ii)]
6. Flammable and other dangerous materials/poisons are stored in locked cabinets or facilities separate from medications and food and accessible only to authorized persons. [1304.53(a)(10)(iii)]
7. Appropriate licenses (water/sewage, food/sanitation, fire codes, and vendor/contractor licenses) are seen. [1304.53(a)(6) and (10)(xiii), 1304.23(e)(1), 1306.30(c)]

Comments:

HEALTH AND SAFETY CHECKLIST

A.		B.		C.		D.	
Yes	No	Yes	No	Yes	No	Yes	No

Area #2: Indoor Facilities (continued)**Facility Layout and Environment**

1. If necessary, there is a safe and effective heating and cooling system. [1304.53(a)(10)(i)]
2. There is at least 35 sq. ft. of usable indoor space per child (not including bathrooms, halls, kitchen, staff rooms, and storage places). [1304.53(a)(5)]
3. Facilities enable the safe and effective participation of children with disabilities. [1308.4(o)4]
4. Rooms are well lit. [1304.53(a)(10)(iv)]

Comments:

A.		B.		C.		D.	
Yes	No	Yes	No	Yes	No	Yes	No

Provisions for Emergencies

1. Exits and/or evacuation routes are clearly marked. [1304.22(a)(3), 1304.53(a)(10)(vii)]
2. Emergency lighting is available. [1304.53(a)(10)(iv)]
3. Emergency telephone numbers (e.g., EMS, Fire, Police, Poison Control) are clearly posted. [1304.22(a)(2)]
4. Policies and plans of action for emergencies that require rapid response on the part of staff (e.g., a child choking) or immediate medical or dental attention are clearly posted. [1304.22(a)(1)]
5. A well-supplied first-aid kit is available, accessible to staff, and out of reach of children. [1304.22(f)(1)]

Comments:

HEALTH AND SAFETY CHECKLIST

A.		B.		C.		D.	
Yes	No	Yes	No	Yes	No	Yes	No

Area #2: Indoor Facilities (continued)

Medication Administration

1. All medications are properly labeled (i.e., name of child/staff, name of medication, dosage, name/number of pharmacy/physician). [1304.22(c)(1)]
2. Medications are under lock and key and out of reach of children. [1304.53(a)(10)(iii), 1304.22(c)(1)]
3. Medications in need of refrigeration are refrigerated. [1304.22(c)(1)]

Comments:

A.		B.		C.		D.	
Yes	No	Yes	No	Yes	No	Yes	No

Area #3: Outdoors

1. There is at least 75 sq. ft. of usable outdoor space per child. [1304.53(a)(5)]
2. The playground equipment is in good repair and safe condition (e.g., adequately secured to the ground, free of sharp edges and/or splinters, soft falling surface). [1304.53(a)(7), 1304.53(a)(10)(viii), 1304.53(a)(10)(x)]
3. The outdoor play area is arranged such that no child can leave the premises or get into unsafe or unsupervised areas. [1304.53(a)(9)]

Comments:



FY 2006 Fiscal Checklist

This checklist, revised for FY 2006, is designed to assist reviewers in monitoring the fiscal health of the grantee, any delegate agencies (as applicable), and compliance with federal regulations. The questions within this checklist have been developed around two critical standards, **internal controls** [45 CFR Parts 74.21(b)(3), 92.20(b)(3)] and **governance** [45 CFR Part 1304.50 (g)(2)]. These two standards are emphasized because, together, they help grantees ensure (a) successful and efficient operations of their own programs (and those of their delegates), (b) reliable financial reporting, and (c) compliance with applicable laws and regulations.

For each question in the checklist, a “Yes” or “No” answer is required. Several of

the questions have one or more follow-up questions that are related to the main question. Answer these questions as directed. Responses with red flags immediately below them, serve as signals to the reviewer of a potential fiscal concern, in which case additional follow-up is needed. In the “Documents Reviewed/People Interviewed/Additional Comments” row, please list the following items:

- evidence, in the form of documents gathered and/or reviewed that help to support your conclusions
- individuals interviewed when answering the checklist questions
- any additional remarks that pertain to the question

Taken collectively, the responses and observations that are recorded will help you in assessing if a grantee and/or delegate has not met federal regulations for internal controls and governance (as described above).

WHAT’S NEW FOR FY 2006?

To facilitate the use of source documents, the format of the FY 2006 fiscal checklist has changed. Related questions are grouped together into five sections (Your responses to questions in the first four sections will greatly impact your answers to the two summary standards in Section V.):

Section I, Fiscal Risk Indicators, consists of 12 questions that will help you evaluate the fiscal health of the grantee and/or

¹ For a detailed discussion of these issues see General Accounting Office (1999), Standards for Internal Control in the Federal Government (GAO/AIMD-00-21-3.1), November.

² At the end of these instructions is an example of the type of follow-up documents, questions, and interviews that might be used to gain additional information on a specific question.

delegate. The majority of the questions can be answered by using the last three annual audits for the entity. Responses to all 12 questions should be taken into consideration when evaluating the status of the entity's fiscal health.

Section II, Internal Controls and Monitoring, consists of 18 questions that will help you evaluate the adequacy of internal controls and the involvement of the governing body, staff and parents in monitoring the fiscal management system. As in Section I, all responses to Questions 13 through 19 on internal control measures should be considered when assessing the appropriateness and adequacy of the entity's internal controls. For the remainder of the questions (20 through 30), specific regulation(s) are cited at the end of each question.*

Section III, Fiscal Accountability, consists of 18 questions that will help you evaluate the grantee's accountability in complying with the terms and conditions of the grant, and other applicable Federal regulations. This section includes questions on cost allocation, interfund borrowing, budget management, salaries, non-federal share, etc. Specific regulation(s) are cited at the end of each question.*

Section IV, Reporting, consists of 7 questions that will help you determine if the grantee is meeting the reporting requirements of the grant. Specific regulation(s) are cited at the end of each question.*

Section V, Summary Standards, consists of 2 questions pertaining to internal control and governance. Specific regulation(s) are cited at the end of each question.* Completion and analysis of all the questions from the previous four sections will help you to determine if the grantee and/or delegate is in compliance with federal regulations for the two specified standards.

Note that OMB Circulars A-122, A-87, and A-21 have been codified. The new CFR citation is referenced in this checklist, as well as in the PRISM 2006 Software.

- * *All questions for which standards are listed should be evaluated based on the standards cited. If the evidence gathered thus far suggests that the grantee/delegate is not in compliance with the specified requirement, please place a check in the box under "Potential Area of Noncompliance".*

In answering the questions on this checklist, some of the documents you might find useful to review include:

- current and prior financial statements from the audit report
- most recent financial reports as delivered to the governing bodies
- Policies and Procedures manual(s) covering fiscal operations (e.g., written accounting procedures and procurement procedures)
- detailed general ledger or accounts payable (AP) disbursements journal
- monthly trial balances
- bank reconciliations
- administrative costs documentation
- program budget planning documents (e.g., forms, memorandums, work papers, GABI, and grant proposals)
- chart of accounts
- property inventory and files for recent major purchases
- audit reports and the management letter that accompanies the audit report (including the most recent)
- current and prior year Financial Assistance Award (FAA)
- notice of grant award
- indirect cost agreement and/or cost allocation plan
- lease agreements
- codes of conduct from personnel policies
- organizational chart or list of staff and function of each staff person, including any vacancies
- payroll journal and/or payroll service summary
- most recent SF-269, with supporting documentation
- PMS-272 with supporting documentation from the past four quarters
- insurance policies (e.g., liability, vehicles, child accident)
- interagency agreements
- Non-Federal share documentation, Department of Agriculture (USDA) accounting records and source documents (e.g. meal counts, etc.)
- Vendor contracts
- grantee charter document
- delegate agencies and other partnership contracts as required


***Please note that questions 29, 41, 50, and 51 apply to grantees only, and question 44 is only applicable to private non-profits.*

Footnote 2

As noted in Footnote 2 on the first page of these instructions, below is an example of the additional types of documents, questions and interviews that could be used to follow-up on a red flag answer to Question #2 on the Checklist.

2. Has the grantee borrowed money within the last 12 months?	
<p>Document Review:</p> <p><i>The notes to the financial statements in the current audit:</i></p> <ul style="list-style-type: none"> • How much was borrowed? • Why was it borrowed? • How was the loan secured? • What are the payments and when are they due? • Is the grantee “living on” borrowed funds (i.e., a line of credit)? • Is there a going concern disclosure note? <p><i>Accounting procedures:</i></p> <ul style="list-style-type: none"> • Are there policies and internal controls regarding cash obligations and borrowing funds? • Is there evidence of governing board review, approval and oversight in the decision to borrow money? • Are there policies limiting the amount of debt the agency can incur? <p><i>Loan documents:</i></p> <ul style="list-style-type: none"> • Are they available to be reviewed? • Do they contain all applicable grant provisions such as “assets may have been purchased with grant funds, therefore cannot be sold without the approval of the granting agency”? • Do they appear to be in the best interest of the grantee? • Are they signed and dated? 	<p>Interview:</p> <p><i>Appropriate fiscal officer and CEO: ask to:</i></p> <ul style="list-style-type: none"> • Tell you more about the loan and reasons for it; • Explain (and document) what funding sources are used to repay the loan; • Describe how the loan was secured; • Describe the Board’s oversight of loan process; • See the loan (or tell you who signed the loan); • See the current balance in the agency’s non-restrictive or general fund account; • Explain if the Board is not aware of the current balance; and • Describe any impact on staff, services or programs. <p><i>Governing body members, asking them to:</i></p> <ul style="list-style-type: none"> • Explain when and how the Board became involved with securing the current loan and past loans; • Describe what funding sources have been used to repay the loan; • Describe the Board’s plan for repaying the loan; • Discuss the agency’s current cash balance; • If the agency is living on borrowed funds; and • Describe how the Board monitors the loan and identifies potential risks.

SECTION I - FISCAL RISK INDICATORS

1 **Y**  **N** Is the ratio of current assets to current liabilities less than 1 (i.e., are there insufficient funds to pay debts due within a year)?
[If yes, please answer the question below. If no, go to question 2.]

Y **N** Has the ratio decreased over the past three years?

Documents Reviewed/People Interviewed/Additional Comments

2 **Y**  **N** Has the grantee borrowed money within the last 12 months?

Documents Reviewed/People Interviewed/Additional Comments

3 **Y**  **N** Has the amount of cash reported on the balance sheet (per audit report) decreased over the past three years?

Documents Reviewed/People Interviewed/Additional Comments


4 **Y**  **N** Does the most recent audit contain a disclosure (*see footnote in audit*) regarding cash flow status?

Documents Reviewed/People Interviewed/Additional Comments


SECTION I - FISCAL RISK INDICATORS (CONTINUED)

5 **Y**  **N** Does the most recent audit show any programs with negative operating balances?


Documents Reviewed/People Interviewed/Additional Comments

6 **Y**  **N** Are there large unfunded liabilities (e.g., annual and sick leave accruals, taxes payable, 401(k) payments outstanding; large mortgage or large line – of – credit payments) or recent significant cost increases?

Documents Reviewed/People Interviewed/Additional Comments

7 **Y**  **N** Are the grantee and/or delegate named in pending or recent litigation? Are there pending or current disallowances from any funding source such as USDA, CSBG, or child care? [Obtain this information through interviews with staff.]

Documents Reviewed/People Interviewed/Additional Comments

8 **Y**  **N** Is there any indication the agency may lose one or more major programs and/or funding sources?

Documents Reviewed/People Interviewed/Additional Comments


SECTION I - FISCAL RISK INDICATORS (CONTINUED)

9 **Y**  **N** Have vendor payments been late?

Documents Reviewed/People Interviewed/Additional Comments

10 **Y**  **N** Do bank statements reflect any negative cash balances, overdraft, or finance charges?

Documents Reviewed/People Interviewed/Additional Comments

11 **Y**  **N** Has there been a recent reduction of program staff or services, a shift towards outsourcing, excessive turnover of supervisory staff, or have key personnel quit unexpectedly?

Documents Reviewed/People Interviewed/Additional Comments

12 **Y**  **N** Have positions been vacant for a significant period of time? (i.e., more than 90 days)?

Documents Reviewed/People Interviewed/Additional Comments

SECTION II - INTERNAL CONTROLS AND MONITORING

13 Y **N**  Does the agency maintain a complete and up-to-date list of all employees?

Documents Reviewed/People Interviewed/Additional Comments

14 Y **N**  Are separations/terminations of employment instances immediately reported to the payroll department?

Documents Reviewed/People Interviewed/Additional Comments

15 Y **N**  Are original time records properly prepared and properly approved by supervisors?

Documents Reviewed/People Interviewed/Additional Comments


16 Y **N**  Are payroll records regularly compared with the records of the personnel department?

Documents Reviewed/People Interviewed/Additional Comments

SECTION II - INTERNAL CONTROLS AND MONITORING (CONTINUED)

17 Y **N**  Are there appropriate internal controls for payroll checks distributed to employees?


Documents Reviewed/People Interviewed/Additional Comments

18 Y **N**  Are there specific procedures for maintaining checks and balances for cash management and other fiscal functions? [To assist in answering this question, consider the questions below.]

- Y **N** Are cash and negotiable securities under lock and key, and is access to them strictly controlled?
- Y **N** Are forms such as blank checks and purchase orders sequentially pre-numbered, physically secure, and is access to them strictly controlled?
- Y **N** Are mechanical check signers and signature plates physically protected, and is access to them strictly controlled?
- Y** **N** Is one individual allowed to control all key aspects of a transaction or event?
- Y **N** Are duties assigned systematically to a number of individuals to ensure that effective checks and balances exist?
- Y **N** Does the grantee have internal controls for mail processing, cash receipts, and cash disbursements?
- Y **N** Are all grantee bank statements reconciled on a monthly basis?
- Y **N** Are there safeguards in place for financial data systems in the event of data failure?
- Y **N** Are changes in payroll properly authorized?

Documents Reviewed/People Interviewed/Additional Comments


SECTION II - INTERNAL CONTROLS AND MONITORING (CONTINUED)

- 19 Y **N**  Do the grantee and/or delegate agencies have policies and procedures for the use of credit cards (e.g. require documentation for expenditures, regularly monitor expenditures, and impose other clear spending limits)?

Potential Area of
Noncompliance
(✓)

☐


Documents Reviewed/People Interviewed/Additional Comments

- 20 Y **N**  Does the grantee/delegate have procedures for minimizing the time elapsing between the draw down of funds from the Payment Management System and disbursement of those funds? [45 CFR Parts 74.21(b)(5), 92.20(b)(7)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

- 21 Y  **N** Have Head Start funds been drawn down in excess of documented cash requirements? [45 CFR Parts 74.22 (b)(2), 92.21 (c)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

- 22 Y **N**  Has the grantee implemented procedures to determine allowability, allocability, and reasonableness of costs as required? [45 CFR Parts 74.21(b)(6), 92.20(b)(5)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

SECTION II - INTERNAL CONTROLS AND MONITORING (CONTINUED)

23 Y ☒ N ☐ Does the grantee/delegate have a written code of standards of conduct governing the performance of their employees engaged in the award and administration of contracts? [45 CFR Parts 74.42, 92.36(b)(3)]

Potential Area of
Noncompliance
(✓)

Documents Reviewed/People Interviewed/Additional Comments

24 Y ☒ N ☐ Does the grantee/delegate have written procurement procedures that provide, at a minimum, all requirements specified in the applicable Federal statutes? [45 CFR Parts 74.44(a), 92.36(c)(3)]

Potential Area of
Noncompliance
(✓)

Documents Reviewed/People Interviewed/Additional Comments

25 Y ☒ N ☐ Are any of the procurement transactions conducted in a manner that does not provide for open and free competition? [45 CFR Parts 74.43, 92.36(c)]

Potential Area of
Noncompliance
(✓)

Documents Reviewed/People Interviewed/Additional Comments

26 Y ☒ N ☐ Was the last required annual audit not completed and/or not submitted timely and/or unavailable? [OMB Circular A-133 (Subpart B.220), 45 CFR Parts 1301.12(a), 74.53(b), 92.42)]

Potential Area of
Noncompliance
(✓)


Documents Reviewed/People Interviewed/Additional Comments

SECTION II - INTERNAL CONTROLS AND MONITORING (CONTINUED)27 Y N  Has the grantee corrected previous audit findings? [OMB Circular A-133 (Subpart C.315, Paragraphs (a) & (b))]Potential Area of
Noncompliance
(✓)☐

Documents Reviewed/People Interviewed/Additional Comments

28 Y N  Does the grantee have a qualified fiscal officer? [45 CFR Parts 1304.52(d)(8)]Potential Area of
Noncompliance
(✓)☐

Documents Reviewed/People Interviewed/Additional Comments

29 Y N  [THIS QUESTION APPLIES TO THE GRANTEE ONLY] Has the grantee implemented procedures for programmatic and fiscal monitoring of its own operations and each of its delegates? [45 CFR Part 1304.51(i)(2)]Potential Area of
Noncompliance
(✓)☐

Documents Reviewed/People Interviewed/Additional Comments

30 Y N  Does the grantee regularly compare budgeted costs to actual costs? [45 CFR Parts 74.21(b)(4), 92.20(b)(4)]Potential Area of
Noncompliance
(✓)☐

Documents Reviewed/People Interviewed/Additional Comments

SECTION III - FISCAL ACCOUNTABILITY (QUESTIONS 31-48)

- 31 Y ☒ N ☐ If the grantee has shared costs, has the grantee used an allocation base that best measures the relative degree of benefit for all benefiting functions? [45 CFR Part 92.20(b)(5); 2 CFR Part 230, Appendix A(D)(1)(b); 2 CFR Part 225, Appendix A(C)(3); and 2 CFR Part 220, Appendix A(C)(4)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

- 32 Y ☒ N ☐ If the grantee and/or delegate charge indirect costs, are those costs supported by a current negotiated indirect cost rate? [2 CFR Part 230, Appendix A(E)(2)(c)&(g); 2 CFR Part 225, Appendix A(H); and 2 CFR Part 220, Appendix A(G)(11)(g)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

- 33 Y ☒ N ☐ Have Head Start funds been used to cover costs normally paid by other funding streams (i.e., interfund borrowing)? [45 CFR Parts 74.21(b)(3), 74.27(a), 92.22(a)(1)&(2), 92.22(b), 92.41(b)&(c)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

- 34 Y ☒ N ☐ Did a review of year-end payments disclose any unusual or irregular items (e.g., large purchases of supplies or equipment or pay out of end-of-year “bonuses”)? [2 CFR Part 230, Appendix A(A)(2); 2 CFR Part 220, Appendix A(C)(2); 2 CFR Part 225, Appendix A(C)(1)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

SECTION III - FISCAL ACCOUNTABILITY (CONTINUED)

35 Y N ☒ Did the grantee award COLA/Quality funds in compliance with the terms of its grant application?
[45 CFR Parts 74.21(b)(3), 92.20(b)(3)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

36 Y ☒ N Are any staff being compensated (salary and fringes) at a rate in excess of the Executive Level II (\$162,100 for 2005)?
(Consider gross pay from all funding sources.) [2 CFR Part 220, Appendix A(C)(2), 2 CFR Part 225, Appendix (C)(1)(d)
and 2 CFR Part 230, Appendix A(A)(2)(b)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

37 Y N ☒ Are the wages of staff (including those identified in question 36. above) reasonable and supported by appropriate wage
comparability data? [2 CFR Part 230, Appendix B(8)(c); 2 CFR Part 225, Appendix B(8)(b)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

38 Y N ☒ Has the grantee and/or delegates provided adequate documentation to demonstrate timely payment of employee
benefits (i.e. Federal and state taxes, health and retirement contributions)? [2 CFR Part 230, Appendix A(A)(2)(g); 2 CFR
Part 225, Appendix A(C)(1)(j); and 2 CFR Part 220, Appendix A(A)(2)(e)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

SECTION III - FISCAL ACCOUNTABILITY (CONTINUED)

39 Y ☒ N Have prior year salaries or other prior year costs been charged to the current budget year? [45 CFR Parts 74.28, 92.23(a)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

40 Y ☒ N Are costs for development and administration necessary and of benefit to the program, properly allocated and documented, and not in excess of 15% of total costs unless a waiver has been granted? [45 CFR Parts 1301.32, Select subsections of 45 CFR Part 1301.32 that are appropriate to the circumstance]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

41 Y ☒ N [THIS QUESTION APPLIES TO THE GRANTEE ONLY] Did the use of Federal funds in the grantee's last budget exceed 80% of the total cost without a waiver? [45 CFR Parts 1301.20(a), 1301.21(a)&(b)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

42 Y ☒ N Do the source, use, and accounting of non-federal funds meet the same requirements as Federal funds, and is the accounting of funds supported by proper source documents [45 CFR Parts 74.23, 92.24, Select subsection(s) of 45 CFR Parts 74.23 and/or 92.24 that are appropriate to the circumstance]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

SECTION III - FISCAL ACCOUNTABILITY (CONTINUED)

- 43 Y ☒ N Have the grantee or delegate agencies made changes to the budget that required prior approval before receiving such approval in writing? [45 CFR Parts 74.25, 92.30](Select subsection(s) of 45 CFR Parts 74.25 and/or 92.30 that are appropriate to the circumstance]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

- 44 Y ☒ N (THIS QUESTION APPLIES TO PRIVATE NON-PROFITS ONLY) Does the grantee fail to have the required insurance coverage? [45 CFR Parts 1301.11, 74.31. (Not applicable for grantees subject to Part 92, who are generally self-insured; select subsections of 45 CFR Part 1301.11 that are appropriate to the circumstance)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

- 45 Y N ☒ Does the grantee meet property management standards for nonexpendable personal property, including conducting a physical inventory every 2 years and having all vehicle titles available? (To assist in answering this question, first consider the questions below.) [45 CFR Parts 74.30, 74.33(a)(1), 74.34(f)(1)-(6), 92.31 - 92.32)]

Y N Is equipment vulnerable to theft, not securely fastened or not protected in some other manner?


Y N Are identification plates and numbers affixed to office furniture and fixtures, equipment, and other portable assets?

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments


SECTION III - FISCAL ACCOUNTABILITY (CONTINUED)

- 46 Y N  If the grantee/delegate has purchased, leased or renovated Head Start facilities using federal funds, is there documentation available to show the facilities transactions were approved, performed in compliance with federal regulations (including compliance with the Davis-Bacon Act), and the Notice of Federal Interest filed? [45 CFR Parts 74.27, 92.22, and 1309]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

- 47 Y N  Are delegate agency, child care partnerships and professional services contracts available, signed, dated and inclusive of elements specified in the applicable regulations and cost principles? [45 CFR Part 1301.33; 2 CFR Part 230, Appendix B(37)(b)(8); 2 CFR Part 225, Appendix B(32)(b)(8); and 2 CFR Part 220, Appendix A(J)(37)(b)(8)] [An expired contract does not constitute adequate documentation. If expired, cite appropriate cost circular, 2 CFR Part 230, Appendix A(A)(2)(g); 2 CFR Part 225, Appendix A(C)(1)(j); and 2 CFR Part 220, Appendix A(A)(2)(e)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

- 48 Y N  Have fiscal resources been used to provide sufficient equipment, toys, materials, and furniture to meet the need and facilitate the participation of children and adults? [45 CFR Part 1304.53(b)(1)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

SECTION IV - REPORTING

49 Y N  Are financial reports current and available upon request? [45 CFR Parts 1304.51(h)(1)&(2), 74.21(b)(1)&(2), 74.53(b), 92.20(b)(1)&(2)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

50 Y N  [THIS QUESTION APPLIES TO THE GRANTEE ONLY] Has the grantee submitted timely and accurate SF-269s and PMS-272s [45 CFR Parts 1304.51(h)(2), 74.52(a)(1)&(2), 92.41(b)&(c)]

Potential Area of
Noncompliance
(✓)

☐


Documents Reviewed/People Interviewed/Additional Comments

51 Y N  [THIS QUESTION APPLIES TO THE GRANTEE ONLY] Does the final SF-269 reconcile with the appropriate quarterly PMS-272 for the same period? [45 CFR Parts 74.21(b)(1), 92.20(b)(1)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments


52 Y  N Have the grantee and delegate agencies failed to submit timely and accurate IRS 941, IRS 990 and other official reports as required? [45 CFR Part 1304.51(h)(2)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments


SECTION IV - REPORTING (CONTINUED)

53 Y **N**  Does the Federal tax information reported agree with other financial reports? (Specifically, is the tax information on the IRS 990 in agreement with the audit report? [45 CFR Parts 74.21(b)(1), 92.20(b)(1)])

Potential Area of
Noncompliance
(✓)

☐


Documents Reviewed/People Interviewed/Additional Comments

54 Y **N**  Has there been a failure to disseminate timely and accurate fiscal information to the management staff, governing body, and policy groups? [45 CFR Parts 1304.51(d)(3), 1304.51(h)(1)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

55 Y **N**  Do the Policy Council and Policy Committee work in partnership with key management staff and the governing body to develop, review, and approve or disapprove all procedures for refunding applications and amendments to refunding applications for Early Head Start and Head Start, including administrative services, prior to the submission of such applications? [45 CFR Parts 1304.50(d)(1)(i)]

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

SECTION V - SUMMARY STANDARDS

Place a check in the box under the “Potential Area of Noncompliance” heading if the weight of the evidence you collected during the review (this includes the answers to all 55 questions in this checklist) suggests that the grantee/delegate is not in compliance with the specified requirement:

56 **Grantee lacks effective control over and accountability for all grantee and/or delegate funds, property and other assets. [45 CFR Parts 74.21 (b)(3), 92.20 (b)(3)]**

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments

57 **Governing body does not ensure that appropriate internal controls are established and implemented to safeguard funds. [45 CFR Part 1304.50 (g)(2)]**

Potential Area of
Noncompliance
(✓)

☐

Documents Reviewed/People Interviewed/Additional Comments



Transportation Services Checklist

Grantee Name _____ **Date/Time** _____

Reviewer _____ **Service Area** _____

Sources of Information Used _____

The Transportation Services Checklist is designed for use on **all** PRISM reviews, whether the grantee or delegate agency provides transportation services or not. The Head Start Transportation Performance Standards apply to all Head Start grantees and their delegates.


The information gathered will be based on bus ride(s), interviews, observations, and document reviews. There are several design changes to the checklist that will help you in your role as a reviewer.

1. The checklist has been numbered for easy reference and separated into four categories:

- Facilities, Materials, Equipment and Transportation (Questions 1-13)
- Early Childhood Development and Health Services (Questions 14-22)
- Family and Community Partnerships (Questions 23-27)
- Program Design and Management (Questions 28-40)

2. The questions marked with **◆** apply to **all** Head Start grantees and their delegates,









whether they provide transportation services or not. These items appear in questions 13-15, 17, and 26-30.

3. The questions marked with  may be observed on bus ride(s).

Team Leaders: You may assign specific items or categories on the checklist to reviewers based on their scheduled activities throughout the week.

TRANSPORTATION SERVICES CHECKLIST






Facilities, Materials, Equipment, and Transportation

- | Yes | No | |
|-------|-------|---|
| _____ | _____ | 1. Each vehicle used in providing transportation services has: <ul style="list-style-type: none"> •  a communication system to call for assistance; •  emergency safety equipment, including a charged fire extinguisher properly mounted near the driver's seat and a sign indicating its location; •  a first aid kit and a sign indicating its location; and •  a seat belt cutter and a sign indicating its location. [1310.10(d)(1-4)] |
| _____ | _____ | 2. Any auxiliary seating used in vehicles providing transportation services has been built into the vehicle by the manufacturer as part of its standard design, maintained in proper working order, and inspected annually. [1310.10(e)] |
| _____ | _____ | 3.  Baggage and other items transported in the passenger compartment are properly stored and secured, aisles remain clear, and doors and emergency exits are unobstructed at all times. [1310.15(b)] |
| _____ | _____ | 4. There are procedures in place to ensure that the bus or alternative allowable vehicle is maintained in safe operating condition. The organization operating the vehicle has established and implemented procedures for: <ul style="list-style-type: none"> • an annual safety inspection through an inspection program licensed or operated by the State; • systematic preventive maintenance; and •  a daily pre-trip inspection by the driver. [1304.53(a)(7), 1310.13] |
| _____ | _____ | 5.  Each vehicle is not required to back up or make "U" turns, except if necessary for safety reasons or because of physical barriers. [1310.20(b)(3)] |
| _____ | _____ | 6.  Trip stops minimize traffic disruptions and afford the driver a good field of view in front and behind the vehicle. [1310.20(b)(4)] |

TRANSPORTATION SERVICES CHECKLIST

Facilities, Materials, Equipment, and Transportation (cont.)


Yes No

- | | | |
|-------|-------|--|
| _____ | _____ | 7. There are specific procedures for use of alternate routes in the case of hazardous conditions that could affect the safety of the children who are being transported. [1310.20(b)(7)] |
| _____ | _____ | 8.  Transit times for children going to and from the program do not exceed one hour each way unless there is no shorter route available or any alternative shorter route is either unsafe or impractical. [1310.20(b)(1)] |
| _____ | _____ | 9.  When possible, stops do not require children to cross the street or highway when boarding or exiting the vehicle. [1310.20(b)(5)] |
| _____ | _____ | 10.  If children must cross the street before boarding or after leaving the vehicle, the children are escorted across the street by the bus monitor or another adult. [1310.20(b)(6)] |
| _____ | _____ | 11.  The number of occupants in the vehicle does not exceed maximum passenger capacity at any time. [1310.20(b)(2)] |
| _____ | _____ | 12.  All vehicle occupants (except for the bus monitors who are assisting children) are seated in height- and weight-appropriate restraint systems while the vehicle is in motion. [1310.15(a), 1310.15(d)]
<i>Exception:</i> Approval letter from the Head Start Bureau is required for an extension of the effective date of the portion of the Head Start regulation relating to child safety restraint systems up to January 20, 2006. |
| _____ | _____ | 13. ♦ Children are only released to a parent, legal guardian, or other individual as designated in writing by the parent or legal guardian. The agency maintains lists of the persons, including alternates in case of emergency, and up-to-date child rosters are maintained at all times to ensure that no child is left behind, either at the classroom or on the vehicle at the end of the route. [1310.10(g)] |

Comments:

TRANSPORTATION SERVICES CHECKLIST



Early Childhood Development and Health Services

Yes	No	
_____	_____	14. ♦ Children receive developmentally appropriate safety training within 30 days of the start of the program year on: <ul style="list-style-type: none"> • safe riding practices; • safety procedures for boarding and leaving the vehicle; • safety procedures in crossing the streets to and from the vehicle at stops; • recognition of danger zones around the vehicle; and • emergency evacuation procedures, including participation in an emergency evacuation drill conducted on the vehicle the child will be riding. [1310.21(a), 1310.21(b)(1)-(5)]
_____	_____	15. ♦ Children's safety training reminder activities have been developed and are developmentally appropriate, individualized, and an integral part of program activities. [1310.21(e)]
_____	_____	16. At least two bus evacuation drills in addition to the one required to be provided within the first thirty days of service have been conducted during each program year. [1310.21(b)(5), 1310.21(d)]
_____	_____	17. ♦ Grantee and delegate agencies have arranged for or provide transportation for children with disabilities to and from the program and to special clinics or other service providers when the special education and related services cannot be provided on-site. [1308.4(h)(6), 1310.22(b)]
_____	_____	18.  Up-to-date family contact information and authorization for emergency care for each child is readily available. [1304.22(a)(2), 1304.51(g)]
_____	_____	19. Appropriate staff is informed of any health or safety accommodations or adaptations needed for children in accordance with the program's confidentiality policy. [1304.22(b)(3)]

TRANSPORTATION SERVICES CHECKLIST

Early Childhood Development and Health Services (cont.)

Yes No




- | | | |
|-------|-------|---|
| _____ | _____ | 20. The agency must establish, maintain, and implement written procedures regarding the administration, handling, and storage of medication for every child. [1304.22(c)] |
| _____ | _____ | 21.  Bus drivers and monitors encourage self-control by using positive methods of child guidance by setting clear, consistent limits. [1304.21(a)(3)(i)(C), 1304.52(h)(1)(iv)] |
| _____ | _____ | 22.  Routines and transitions occur in a timely, predictable, and unrushed manner according to each child's needs. [1304.21(a)(3)(ii)] |

Comments::

TRANSPORTATION SERVICES CHECKLIST

Family and Community Partnerships

Yes No

- | | | | | |
|-------|-------|-----|---|--|
| _____ | _____ | 23. |  | Effective two-way communication between staff and parents is facilitated on a regular basis throughout the program year. [1304.51(c)(1)] |
| _____ | _____ | 24. |  | Interactions with families are respectful. [1304.40(a)(5)] |
| _____ | _____ | 25. |  | Communication with parents is conducted in the parents' primary or preferred language or through an interpreter, to the extent feasible. [1304.40(a)(5)] |
| _____ | _____ | 26. | ◆ | Parents receive safety training within 30 days of the start of the program year that: <ul style="list-style-type: none"> • emphasizes the importance of escorting their children to the vehicle stop and reinforcing the vehicle safety training. • complements the training provided to their children so that safety practices can be reinforced both in the program and at home by the parent. [1310.21(a), 1310.21(c)] |
| _____ | _____ | 27. | ◆ | Reasonable efforts are made to coordinate transportation resources with other human services agencies in the community. [1310.23(a)] |

Comments:

TRANSPORTATION SERVICES CHECKLIST

Program Design and Management


Yes No

- | | | |
|-------|-------|--|
| _____ | _____ | 28. ♦ The agency assists as many families as possible who need transportation in order for their children to attend the program in obtaining that transportation. [1310.10(a)] |
| _____ | _____ | 29. ♦ The specific types of transportation assistance being offered are made clear to all prospective families in the program's recruitment announcements. [1310.10(b)] |
| _____ | _____ | 30. ♦ If the agency has decided not to provide transportation services, either for all or a portion of the children, the agency provides reasonable assistance to the families of such children to arrange transportation to and from its activities. [1310.10(b)] |
| _____ | _____ | 31. If the agency provides transportation through an arrangement with another organization or individual, the agency has ensured compliance of the transportation provider with the Head Start regulations. [1310.10(c)] |
| _____ | _____ | 32. Each vehicle purchased after February 20, 2001 is a school bus or an allowable alternate vehicle equipped for use of height- and weight-appropriate child safety restraint systems and with a reverse beeper. [1310.10(c)] |
| _____ | _____ | 33. All accidents involving transportation services are reported in accordance with applicable State requirements. [1310.10(f)] |
| _____ | _____ | 34. Where available in the State or jurisdiction, each driver has a valid Commercial Driver's License (CDL) for vehicles in the same class as the vehicle the driver operates. [1310.16(a)(1)] |
| _____ | _____ | 35. In accordance with the applicant review procedures, bus drivers' driving records have been checked through the appropriate State agency, including the National Driver Register, if available in the State. [1310.16(b)(2)] |

TRANSPORTATION SERVICES CHECKLIST

Program Design and Management (cont.)

Yes No

- | | | | |
|-------|-------|-----|--|
| _____ | _____ | 36. | <p>Each bus driver has received a combination of classroom and behind-the-wheel training prior to transporting any child enrolled in the agency's program, and refresher training annually, on how to:</p> <ul style="list-style-type: none"> • operate the vehicle safely and efficiently; • safely run a fixed route, including loading and unloading children, stopping at railroad crossings and performing other specialized driving maneuvers; • administer basic first aid; • handle emergency situations, including vehicle evacuation procedures; • operate any special equipment, such as wheelchair lifts, assistance devices or special occupant restraints; • conduct routine vehicle maintenance and safety checks; and • maintain accurate records as necessary. [1310.17(a), 1310.17(b)(1)-(7)] |
| _____ | _____ | 37. | <p>Bus drivers receive annual evaluations, which must include an on-board observation of road performance. [1310.17(f)(1)]</p> |
| _____ | _____ | 38. | <p> At least one bus monitor is on board at all times. [1310.15(c)]</p> <p>Exception: Approval letter from the Head Start Bureau is required for an extension of the effective date of the portion of the Head Start regulation relating to bus monitors up to January 20, 2006.</p> |

TRANSPORTATION SERVICES CHECKLIST

Program Design and Management (cont.)

Yes No

- | | | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <p>39. Each bus monitor has been trained prior to duty on:</p> <ul style="list-style-type: none"> • child boarding and exiting procedures; • use of child restraint systems; • any required paperwork; • responses to emergencies; • emergency evacuation procedures; • use of special equipment; • child pick-up and release procedures; • pre- and post-trip vehicle check. [1310.17(f)(2)] <p><i>Exception:</i> Approval letter from the Head Start Bureau is required for an extension of the effective date of the portion of the Head Start regulation relating to bus monitors up to January 20, 2006.</p> |
| <input type="checkbox"/> | <input type="checkbox"/> | <p>40. Each agency has identified the true cost of providing transportation in order to knowledgeably compare the costs of providing transportation directly versus contracting for the service. [1310.23(b)(1)]</p> |

Comments:



Classroom, Family Child Care, or Socialization Experience Observation Instrument

SETTING 1

Setting: _____

Teacher: _____

Date: _____

Start time: _____ End time: _____

Children's ages: _____

Focus child: _____

Number of children: _____

Number of staff: _____

Number of parents: _____

SETTING 2

Setting: _____

Teacher: _____

Date: _____

Start time: _____ End time: _____

Children's ages: _____

Focus child: _____

Number of children: _____

Number of staff: _____

Number of parents: _____

This instrument is designed to guide service reviewers' observations in each focus child's group setting (i.e., classroom, family child care home, or home-based socialization experience). The form contains a page for each of the concepts. Each concept highlights the Performance Standards and other regulations relevant to the concept.

The form provides space to write observations for two settings, one child per setting. Use the spaces labeled "Setting One" and "Setting Two" to take notes about what you see and hear in relation to each concept for your focus child. Make photocopies of these forms to record observations for additional focus children.

- What are the children doing, saying, and using?
- What are teachers and other staff doing, saying, and using?
- What is the environment like? How do the equipment and materials in the environment support each concept?

However, you will not be able to observe all of the concepts listed, so you may find it helpful to ask some additional questions of each teacher in whose classroom you observe. Before you begin your conversation, ask the teacher to show you the following:

- a copy of the curriculum specific to infants, toddlers, or preschoolers;
- examples of the tools used in the assessment system;
- the focus child's file (may include the developmental screening, assessment data, and individualization plans); and
- planning documents.

INTERVIEW QUESTIONS	NOTES
<p>We'd like to talk to you about your understanding of the curriculum, how you learn about children's progress, and how you plan for the children.</p> <ul style="list-style-type: none"> • How do you adapt the curriculum for use in your classroom? How do you connect what you learned about (<i>focus child</i>) to what you are teaching him/her? • How do you integrate issues of health, nutrition, and mental health into the curriculum? How do you prepare children for transitions? Can you provide an example? • What developmental screening tool do you use? Are you involved in the process of conducting the developmental screening? If you're not, how do you get the results? How does the program use the information from (<i>focus child's</i>) screening? • When screening results in a child having an IEP or IFSP, how do you use that plan in your work with that child? How do you use the information from (<i>focus child's</i>) assessments to work with him/her individually? Can you show us an example of how you do that? • How often do you assess children? How do you use the assessment information you have gathered for (<i>focus child</i>) to learn about his/her progress? How do you communicate this information to his/her parents? • How are (<i>focus child's</i>) parents involved in the planning and implementation of the curriculum to individualize for their child? • If the focus child is a child with disabilities, ask: How are (<i>focus child's</i>) parents involved in the planning for their child's IEP? • For 3- to 5-year-old classrooms, ask: How does your curriculum respond to the Head Start Outcomes Framework? 	

REVIEWER	COMMENTS
<p>At least one child development or disabilities services reviewer should read the written curriculum for the following:</p> <ul style="list-style-type: none"> • goals for children’s development and learning; • experiences through which children will achieve these goals; • what staff and parents do to help children achieve these goals; • the materials needed to support the implementation of the curriculum; • consistency with the <i>Head Start Program Performance Standards</i> and other regulations; • a base of sound child development principles about how children grow and learn; • for preschool classrooms, inclusion of the eight domains of development and learning and the required domain elements and indicators (e.g., associates sounds with written words, recognizes a word as a unit of print, and phonological awareness). <p>Questions:</p>	

NOTES

ISSUES, QUESTIONS, AND FOLLOW-UP:

1. TEACHER INTERACTIONS AND STRATEGIES

- adults using a variety of intentional strategies that vary in complexity;
- supervision of all indoor and outdoor activities;
- positive child guidance and appropriate limits.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:

- child-initiated and adult-directed activities;
- individual and small group experiences;
- children exploring and making choices;
- timely, predictable, and unrushed routines and transitions;
- talking to babies, singing and playing with them during diaper changes, mealtimes, and other routines.

Setting 1:

Setting 2:

<i>ISSUES, QUESTIONS, AND FOLLOW-UP:</i>

2. FACILITATING CHILDREN'S LANGUAGE AND LITERACY DEVELOPMENT

- language use and interaction among and between children and adults;
- adults fostering children's communication, including home language;
- experiences that develop auditory and visual discrimination;
- experiences that support creative expression;
- experiences that develop school-readiness skills in literacy.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:

- alphabet posters, puzzles, and books;
- examples of functional print and other materials in appropriate places: mailboxes, sign-in charts, maps, helper charts, and schedules;
- opportunities for children to write and dictate stories and messages;
- art, music, rhyming songs, and movement;
- learning activities such as games, puzzles, and books that promote knowledge of letters (alphabet) and sounds;
- adults reading and discussing stories one-on-one and in small groups;
- children choosing books to look at alone, to share with a friend, or to take home;
- adults and children asking questions and engaged in meaningful conversations;
- experiences, materials, conversation and activities that support the language used at home and English as a second language.

Setting 1:

Setting 2:

<i>ISSUES, QUESTIONS, AND FOLLOW-UP:</i>

3. FACILITATING CHILDREN'S MATH AND SCIENCE DEVELOPMENT

- experiences that develop skills in mathematics and science;
- experiences that develop auditory and visual discrimination;
- opportunities for children to discover how numerical concepts relate to other concepts.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:

- puzzles, games, unit blocks, and manipulatives that range in complexity;
- materials and experiences that develop counting, sequencing, and one-to-one correspondence;
- materials and experiences that encourage understanding of cause and effect and spatial relationships, such as a map in the block area;
- opportunities for children to discover how mathematical concepts relate to other concepts, for example measuring or weighing;
- opportunities for children to count, classify, sequence, sort, and match;
- children experimenting, describing, and making predictions;
- children using recipes for making snacks;
- children caring for plants and animals, and learning about science in their surroundings;
- adults asking children questions in ways that extend their thinking.

Setting 1:

Setting 2:

<i>ISSUES, QUESTIONS, AND FOLLOW-UP:</i>

4. FACILITATING CHILDREN'S SOCIAL AND EMOTIONAL DEVELOPMENT

- experiences that foster independence and trust;
- age-appropriate expectations of children;
- adults interacting in supportive ways;
- experiences that help children develop social skills, competence, respect for others, and positive attitudes towards learning.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:

- self-portraits and family pictures;
- books, stories, puppets, and other dramatic play experiences;
- interactive games and activities;
- familiar routines and transitions;
- clear, consistent age-appropriate rules developed with child input;
- children accessing materials independently;
- adults' timely response to children's cries and other cues;
- adults encouraging and modeling problem-solving, behaviors, and language;
- adults reinforcing age-appropriate self-control behaviors;
- singing or talking during routines and transitions.

Setting 1:

Setting 2:

<i>ISSUES, QUESTIONS, AND FOLLOW-UP:</i>

5. FACILITATING CHILDREN'S PHYSICAL DEVELOPMENT

- experiences that develop sensory and motor skills;
- experiences that develop fine and gross motor skills;
- children using and coordinating small muscles, including eyes, hands, and eye-hand coordination;
- sufficient safe indoor and outdoor space with age-appropriate equipment and materials.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:

- tools such as blocks, beads, scissors, stapler, and writing or drawing tools, pencils and brushes, as appropriate;
- opportunities and sufficient space for children to crawl, sit, walk, run, jump, and climb;
- age- and ability-appropriate equipment and materials;
- children using motor skills in daily routines such as pouring juice or milk, serving themselves, buttoning, and zipping;
- children manipulating materials such as sand, water, and clay.

Setting 1:

Setting 2:

<i>ISSUES, QUESTIONS, AND FOLLOW-UP:</i>

6. PREVENTION AND EARLY INTERVENTION INTEGRATING HEALTH, NUTRITION, MENTAL HEALTH, SAFETY, AND WELLNESS

- health, nutrition, and mental health integrated into routines and children's learning experiences.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:

- toothbrushing and handwashing;
- children using tissues and throwing them in the wastebasket after use;
- sufficient time for meals;
- adults, toddlers, and preschool children sharing family-style meals and pleasant conversations;
- infants held while being fed;
- children involved in food experiences;
- topical books, songs, games, and fingerplays;
- children role playing;
- adults and children talking about visits to the dentist and doctor;
- experiences representative of children's cultures.

Setting 1:

Setting 2:

ISSUES, QUESTIONS, AND FOLLOW-UP:

7. INDIVIDUALIZING AND DISABILITIES SERVICES

- respect for the culture, language, ethnicity, family, and ability of each child;
- facilities that ensure children's safety, comfort, and participation;
- environment and curriculum that reflect the IFSP or IEP;
- adults observing and assessing children's behavior and progress.

Observe: What are the children doing? What are the teachers and adults doing? What is the environment like?

Examples you might *Look For* include:

- books, music, posters, and games in different languages and representing different cultures;
- dolls, posters, pictures, and books that represent children with disabilities;
- special furniture, equipment, and materials, if needed, to accommodate a child with disabilities;
- activities adapted to include children with disabilities;
- experiences required in the IFSP or IEP;
- adults working with individual children and with small groups of children;
- self-stick notes, notebooks, folders, cameras, or other procedures used to record observations.

Setting 1:

Setting 2:



Home Visit Observation Instrument

SETTING 1

Setting: _____

Teacher: _____

Date: _____

Start time: _____ End time: _____

Children's ages: _____

Focus child: _____

Number of children: _____

Number of staff: _____

Number of parents: _____

SETTING 2

Setting: _____

Teacher: _____

Date: _____

Start time: _____ End time: _____

Children's ages: _____

Focus child: _____

Number of children: _____

Number of staff: _____

Number of parents: _____

Instructions for Home Visit Observations

This observation instrument is designed to help Service Reviewers observe key early childhood concepts during a home visit observation in a focus child's home when the focus child is enrolled in a home-based option. Each concept highlights the Performance Standards and other regulations relevant to the concept. The work of home visitors is very different from the work of classroom teachers. Home visitors work primarily with and through parents to support their child's growth. Therefore, the observation asks you to focus on how home visitors support parents in working with their child, and on the partnership between parents and the home visitor.

The form provides space to write observations for two settings. Use the spaces labeled "Setting One" and "Setting Two" to take notes about what you see and hear in relation to each concept for your focus child. For each setting take specific notes about what you see and hear in order to answer the following questions:

- What are the children doing, saying, and using?
- What is the parent doing, saying, and using?
- What is the home visitor doing, saying, and using?

Remember that children in home-based options are exposed to the program's curriculum both through home visits and group socialization experiences. If you were to observe children in both environments, you would see many experiences that support school readiness. However, for the limited time you will be on a home visit you may see only a few specific activities carried out by the home visitor and parent. Among those you may see are the following:

- art, music, rhyming songs, and movement;
- learning activities and games that promote knowledge of letters and sounds;
- adults reading and discussing stories;
- adults and children asking questions and engaged in extended conversations;
- children's use of tools such as beads, scissors, paint brushes, and a variety of writing tools;
- materials, conversations, and activities that support language use in the home language and English as a second language;
- puzzles, games, blocks, and other manipulatives that range in complexity;

- materials and experiences to develop counting, sequencing, and one-to-one correspondence;
- opportunities for the children to count, classify, sequence, sort, and match; and
- children using recipes for making snacks and involved in food experiences.

Use these and other similar activities to guide your observations.

Since you will not be able to observe all of the concepts listed, you will find it helpful to interview the home visitor as well. Before you begin your conversation, ask the home visitor to show you the following:

- a copy of the curriculum specific to infants, toddlers, or preschoolers;
- examples of the tools used in the assessment system;
- the focus child's file (may include the developmental screening, assessment data, and individualization plans); and
- planning documents.

INTERVIEW QUESTIONS	NOTES
<p>We'd like to talk to you about your understanding of the curriculum, how you learn about children's progress, and how you plan for the children.</p> <ul style="list-style-type: none"> • Tell us about the curriculum you are using. How do you connect what you learned about (<i>focus child</i>) to what you are teaching him/her? • How do you integrate issues of health, nutrition, and mental health into the curriculum? How do you prepare children for transitions? Can you provide an example? • What developmental screening tool do you use? Are you involved in the process of conducting the developmental screening? If you're not, how do you get the results? How does the program use the information from (<i>focus child's</i>) screening? • When screening results in a child having an IEP or IFSP, how do you use that plan in your work with that child? Can you give us an example of how you do that? • Describe your process for the ongoing assessment of children. How often do you assess children? • How have you been using the results from the ongoing assessment? How do you use the results to help you in your planning? How do you use the information from (<i>focus child's</i>) assessments to work with him/her individually? Can you show us an example of how you do that? • How do you communicate with (<i>focus child's</i>) parents about their child's progress? How are (<i>focus child's</i>) parents involved in the planning, individualizing, and implementation of the curriculum? • If the focus child is a child with disabilities, ask: How are (<i>focus child's</i>) parents involved in the planning for their child's IEP? • For 3- to 5-year-old classrooms ask: How does your curriculum respond to the Head Start Outcomes Framework? 	

REVIEWER	COMMENTS
<p>Child development and/or disabilities services reviewers should review the written curriculum for the following:</p> <ul style="list-style-type: none">• goals for children's development and learning;• experiences through which children will achieve these goals;• what staff and parents do to help children achieve these goals;• the materials needed to support the implementation of the curriculum;• consistency with the <i>Head Start Program Performance Standards</i> and other regulations;• a base of sound child development principles about how children grow and learn; and• for preschool programs, inclusion of the eight domains of development and learning and the required domain elements and indicators (e.g., associates sounds with written words, recognizes a word as a unit of print, and phonological awareness). <p>Questions:</p>	

1. HOME VISIT INTERACTIONS AND STRATEGIES

How does the home visitor:

- demonstrate a friendly, cooperative relationship with the family?
- encourage parents to take leadership of the home visit?
- communicate in the family's preferred language?
- use the home as a learning environment and as a resource for curriculum experiences?
- understand the link between home visits and socialization experiences?
- (For preschool children) help parents plan experiences that foster their child's development and learning in the eight domains?
- help parents improve their parenting skills?
- plan home visits with parents to incorporate all services of the Head Start program?
- evaluate the home visit with parents?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

2. FACILITATING CHILDREN'S LANGUAGE AND LITERACY DEVELOPMENT

How does the home visitor help parents

- understand how children learn?
- provide age-appropriate experiences that support child language and literacy learning and development?
- provide school-readiness experiences through home visits and group socializations that reflect the program's curriculum?
- value creative expression?
- foster communication, including communication in the home language?
- develop auditory and visual discrimination?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

3. FACILITATING CHILDREN'S MATH AND SCIENCE DEVELOPMENT

How does the home visitor help parents provide:

- experiences that develop skills in mathematics?
- experiences that develop skills in science?
- experiences that develop auditory and visual discrimination?
- opportunities for children to discover how numerical concepts relate to other concepts?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

4. FACILITATING CHILDREN'S SOCIAL AND EMOTIONAL DEVELOPMENT

How do the home visits help parents:

- provide experiences that foster independence?
- develop age-appropriate expectations of children?
- interact in supportive ways?
- help children develop social skills, respect for others, and friendships?
- help children feel successful, competent, and positive toward learning?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

5. FACILITATING CHILDREN'S PHYSICAL DEVELOPMENT

How does the home visitor help parents:

- provide experiences that develop sensory and motor skills?
- provide experiences that develop fine and gross motor skills?
- assist children in using and coordinating small muscles including eyes, hands, and eye-hand coordination?
- provide sufficient safe age-appropriate equipment and materials?
- supervise their child during physical activities?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

6. CURRICULUM: PREVENTION AND EARLY INTERVENTION INTEGRATING HEALTH, NUTRITION, MENTAL HEALTH, SAFETY, AND WELLNESS

How does the home visitor help parents:

- ensure a safe environment?
- promote health, nutrition, and wellness?
- understand and use health and hygiene practices?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

7. CURRICULUM: INDIVIDUALIZING AND DISABILITIES SERVICES

How do the home visitor and the parent:

- plan and implement experiences that match the child's current developmental level?
- understand ways to adapt or change activities for the child?
- identify, select, and use toys, books, and other materials that match the child's interests and abilities?
- incorporate IFSP or IEP goals into daily activities?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:

8. FAMILY PARTNERSHIPS

How does the home visitor:

- support positive relationships?
- respect the home language and culture?
- encourage parents to get involved in other areas of the Head Start program?
- support parents in progress towards their goals?

Observe: What are the adults doing? What is the child doing?

Setting 1:

Setting 2:

Issues, Questions, and Follow-up:



Income Eligibility Process and Data Collection Form Instructions

File Selection Process:

For FY 2006, the Head Start Bureau is requiring each PRISM review team to review a sample (see Sample Size Look-Up Table) of randomly selected children's files to obtain information regarding the program's compliance with income eligibility program requirements. These files cannot be those belonging to focus children who are already involved in the PRISM process. With the exception of this restriction relating to focus children, the exact process for selecting the files is to be decided at the team leader's discretion.

Sample Size Look-Up Table:

This table should be used to determine the number of files that will be reviewed. The first column represents the program's actual enrollment, and the second column is the corresponding sample size for each of those actual enrollment (or range of actual enrollment) numbers. If the program's actual enrollment is less than 20, please review all of the children's files (e.g., review all 17 files for the 17 enrolled children). For enrollment numbers of 20 or greater, refer to the table to determine the correct sample size.

Actual Enrollment	Sample Size
0	0
1	1
2	2
3	3
4	4
5	5
6	6
7	7
8	8
9	9
10	10
11	11
12	12
13	13
14	14
15	15
16	16
17	17
18	18
19	19
20-37	20
38-77	25
78-597	30
598 or more	35

Data Collection Form Completion:

1. Please enter the program name, dates of the review, grant number, the program's actual enrollment figure, the number of focus children already selected for the PRISM review, and your name in the spaces provided.

NOTE: An Information Memorandum (IM) (Log no. ACYF-IM-HS-05-04) issued by ACF on September 7, 2005 indicated the following income eligibility exceptions for children who are considered evacuees due to Hurricane Katrina. Accordingly, Reviewers should accept as eligible those families that are considered evacuees due to Hurricane Katrina. The IM indicates:

“Any family which declares it has been forced to leave its home because of Hurricane Katrina should be considered an evacuee. As such, the pre-school age children of these families are to be considered as income eligible for Head Start. If a family does not have a child’s birth certificate, programs should accept the family’s information about the child’s birth date. A note should be included in each such child’s file that age and/or income eligibility was determined based on information provided by the child’s family.”

For more information or to view the entire IM, refer to the following website:
http://www.headstartinfo.org/publications/im05/im05_04.htm

2. For each child, determine if the program identified the child as income eligible or as part of the program’s enrollment from “over-income” families.
 - a. For all children identified by the program as income eligible (i.e., from a household that meets the low-income guidelines), enter a Y in column B and proceed to step 3 (column C).
 - b. If the child was enrolled as an “over-income” child, note that on the attached form by entering an N in column B. If you enter an N in column B, your work for that specific child’s file has been completed and you should proceed to the next file.
3. Determine if there is a signed statement by a Head Start program employee stating that the child was determined to be income eligible to participate in the program.
 - a. If the file contains a signed determination statement, enter a Y in column C and proceed to step 4 (column D).
 - b. If the file does not contain a signed determination statement, enter an N in column C. If you enter an N in column C, your work for that specific child’s file has been completed and you should proceed to the next file.
4. Determine if there is additional documentation that was used in verifying and determining the child’s income eligibility.
 - a. If the file contains additional documentation used to verify the child’s income eligibility status, enter a Y in column D and proceed to step 5 (column E).
 - b. If the file does not contain additional documentation used to verify the child’s income eligibility status, enter an N in column D. If you enter an N in column D, your work for that specific child’s file has been completed and you should proceed to the next file.

5. Review the documentation used to determine eligibility and make your own determination about the child's eligibility.
 - a. If you concur with the program that the child is income eligible (i.e., from a household that meets the low-income guidelines), enter a Y in column E.
 - b. If you conclude that the child is not income eligible (i.e., "over-income"), enter an N in column E.

You should feel free to discuss any issues in this area with the Head Start program, where appropriate.

Example of Correct Data Collection Form Completion:

A	B	C	D	E
	Program has enrolled the child as an income eligible child	Reviewer finds a signed statement in folder identifying that eligibility has been verified	Reviewer finds in folder documentation used by the program for determining eligibility	Reviewer supports grantee's determination of income eligibility
File Number	(Y or N)	(Y or N)	(Y or N)	(Y or N)
1	Y	N		
2	N			
3	Y	Y	Y	Y

The reviewer correctly stopped working on File Number 1 after entering N in column C. Also, the reviewer correctly filled out the form by leaving the rest of the columns blank after writing N in column B for File Number 2. For File Number 3, the reviewer filled in all four columns because every column had a Y in them. This example demonstrates the correct completion of the form because once an N is entered into a column, the reviewer should stop work for that file and move on to begin work on the next file.

Example of Incorrect Data Collection Form Completion:

A	B	C	D	E
	Program has enrolled the child as an income eligible child	Reviewer finds a signed statement in folder identifying that eligibility has been verified	Reviewer finds in folder documentation used by the program for determining eligibility	Reviewer supports grantee's determination of income eligibility
File Number	(Y or N)	(Y or N)	(Y or N)	(Y or N)
1	Y	Y	N	Y

The reviewer should have stopped work on File Number 1 after entering N in column D. Since there is no additional documentation verifying income eligibility, it would be impossible for the reviewer to make a determination of support for the grantee's initial determination of income eligibility. Therefore, column E should have been left blank and the reviewer would begin work on File Number 2.

Completed Forms

Please deliver completed forms to the team leader as part of the requirement to submit all review-related documentation at the end of the On-Site Activities phase of the review.

Income Eligibility Data Collection Form

Program Name: _____ *Review Date:* _____

Reviewer Name: _____ *Grant Number:* _____

Actual Enrollment: _____ *Number of PRISM Focus Children:* _____

A	B	C	D	E
File Number	Program has enrolled the child as an income eligible child (Y or N)	Reviewer finds a signed statement in folder identifying that eligibility has been verified (Y or N)	Reviewer finds in folder documentation used by the program for determining eligibility (Y or N)	Reviewer supports grantee's determination of income eligibility (Y or N)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				

PRISM | Income Eligibility Process and Data Collection Form

A	B	C	D	E
File Number	Program has enrolled the child as an income eligible child (Y or N)	Reviewer finds a signed statement in folder identifying that eligibility has been verified (Y or N)	Reviewer finds in folder documentation used by the program for determining eligibility (Y or N)	Reviewer supports grantee's determination of income eligibility (Y or N)
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				
29				
30				
31				
32				
33				
34				
35				



Forms

(Appendix II)

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GRANTEE'S ADVANCE ACTIVITIES CHECKLIST

This checklist summarizes for you the activities that need to be completed during the Advance Activities phase of the review. Additional details regarding each of the listed activities can be found in the *PRISM Guide*.

Record Team Leader Name and Review Dates

☐ Name of Team Leader: _____

☐ Dates of Review: _____

Provide Background Information

- ☐ Make available to the team leader materials as requested on the **PRISM Records Request Form**. The form specifies:
 - Documents to be delivered to the hotel for advance review by the Fiscal Reviewer; and
 - Documents that you must make available to the review team while on-site.
- ☐ Upon being contacted by the team leader, provide to the team leader written certification that relevant fiscal documents will be delivered to the review team's hotel no later than the Saturday afternoon before the start of the On-Site Activities phase of the review.

Prepare for the Entrance Meeting

- ☐ Work with the team leader to schedule and identify the location of the **Entrance Meeting**, which is the first event of the On-Site Activities phase of the review. Invite any staff you believe should attend, as well as your governing body chairperson, Executive Director, and Policy Council chairperson. Estimate no more than 1 hour for the meeting.

Assist in the Identification of Delegate Agencies and the Selection of Centers and Classrooms to Be Visited

Note: While the team leader may select the individual sites to be visited without your direct assistance, your help is still needed in the facilitation of that process.

- ☐ If you are a grantee with delegate agencies, provide the team leader with an updated list of names of all delegate agencies. Note the following information next to each agency: if it is a new Head Start center, has a new director, has had significant staff turnover, involves a child care partnership, or if it is one you would especially like the team to visit.

- Work with the team leader to schedule and identify the location(s) of the **Family Group Interview**. Once you know when the focus families will be available for an interview, talk to the team leader to arrange a date and time for the interview. The interview is generally held after reviewers have had the opportunity to observe their focus children and look at children and families' files. Also, take care of logistical arrangements such as transportation, child care, and translation, if needed. Estimate no more than 2 hours for the session.
- Work with the team leader to arrange for the review team to observe a **Policy Council or Policy Committee meeting**. This should be a meeting during which regular agenda topics are discussed. Make sure the Policy Council or Policy Committee plans to stay for about half an hour after the meeting to talk with the reviewers. Estimate no more than 1 hour for the session.
- Work with the team leader to arrange for the review team to speak with as many members of the **governing body** as seems feasible. If possible, schedule a meeting between reviewers and some members of the governing body. Otherwise, ask representative members of the governing body when it would be convenient for a reviewer to call them or visit them for an individual interview. Estimate no more than 1 hour for the session.
- Work with the team leader to schedule and identify the location(s) of the **Child Care Partner Interview(s)**. If a group interview is not possible, the appropriate reviewers may be able to speak to one or several of the partners either by phone or in person when they visit their child care program to observe a focus child. If you have only a small number of child care partners, consider adding them to the Community Partners group. Estimate 30 minutes to 1 hour for the session.
- Work with the team leader to arrange for reviewers to speak with key **community partners**, including a representative of the Local Education Agency (LEA) or Part C¹ agency. Ask participants of the Community Partnerships Interview to complete the Community Partnerships Information Form (see Appendix II: Forms) and provide the team leader with these completed forms. Conversations with community partners may occur through individual meetings, individual phone calls, or a group interview. Estimate about 30 minutes to 1 hour for the interview(s).
- Arrange with the team leader to arrange for at least one reviewer to accompany children on a bus ride.

Grantee Briefings

- Discuss with the team leader expectations regarding the frequency timing and circumstances of daily briefings.

¹ Individuals with Disabilities Education Act (IDEA)

TEAM LEADER'S ADVANCE ACTIVITIES CHECKLIST

This checklist summarizes for you the activities that need to be completed during the Advance Activities phase of the review. Note that ☐'s placed before an item mean that grantee staff need not be involved; ☐'s *might* require input from the grantee's Head Start director.

All forms referred to in this checklist are located in the Forms appendix of the *PRISM Guide*.

Record Identifying Information

Grantee Name: _____

Grant Number: _____

Name of Grantee Director: _____

Record Dates for Review

☐ Dates: _____

Contact the Grantee

- ☐ Contact the grantee approximately one month prior to the scheduled review date. During the initial contact, introduce yourself and make logistical preparations.
- ☐ Send letter to grantee confirming dates of review.

Request Background and Advance Review Documents

- ☐ Complete the PRISM Records Request Form and deliver to the grantee. Complete each section of the PRISM Records Request Form to specify:
 - Documents to be delivered to the hotel for advance review by the Fiscal Reviewer (work with the Fiscal Reviewer in identifying this information); and
 - Documents that the grantee must make available to you and your team while on-site.
- ☐ Communicate to the grantee director that he or she must deliver to you in advance of the Fiscal Reviewer's anticipated arrival date, written certification that relevant fiscal documents will be delivered to the review team's hotel no later than the Saturday afternoon before the start of the On-Site Activities phase of the review.

Review the Team Composition

- ☐ Danya Review Planners will assign reviewers to each scheduled review. The Team Leader should review the team composition and address with the Review Planner any additional staffing needs.

Arrange for Distribution of Advance Review Information

- ☐ Work with the grantee to ensure timely delivery to the hotel of specified fiscal documents for advance review by the fiscal reviewer(s).

Schedule the Review Team Planning Meeting

- ☐ Schedule the Review Team Planning Meeting to occur (on-site or at the hotel) prior to the Entrance Meeting at the grantee's site.

Schedule the Entrance Meeting Interview

- ☐ Schedule the Entrance Meeting as the first grantee event of the review. The director may invite any staff he or she believes should attend. Estimate no more than 1 hour for the meeting.

For grantees with delegates: Determine whether separate entrance meetings are desirable, and if so, schedule such meetings.

Select Centers and Geographic Areas for Family Child Care or Home-Based Option

- ☐ Complete Step 1 on the Selection Process Form to select centers and geographic areas to visit. Record the names of the centers (including child care partners' centers) and areas on the Selection Tree Form.

Select Classrooms, Family Child Care Homes, and Home Visitors

- ☐ Complete Step 2 on the Selection Process Form to select classrooms and/or homes to visit and home visitors to accompany. Record the names of the lead teachers, home visitors, and family child care providers on the Selection Tree Form.

Select Focus Children and Families

- ☐ Complete Step 3 on the Selection Process Form to select focus children and their families.

Schedule the Family Group Interview

- ☐ Work with the grantee director to schedule the Family Group Interview at a time convenient for most parents to attend. Assign the facilitator and notetaker. All focus families should be invited to attend the interview. Reviewers should make every effort to talk to members of

all focus families during the review, including those who are not able to attend the Family Group Interview, so that there is a broad representation of parents in the review process. Alternative ways to contact parents who are not able to join the interview include telephone calls in the evening, speaking with parents when they drop off or pick up their children, or going on a bus ride. Estimate no more than 2 hours for the session.

Schedule the Policy Council/Committee Meeting

- Arrange with the director, if possible, to observe a meeting of the policy group. Each meeting should include discussion of regular agenda topics. Assign the reviewers who will both attend the meeting and interview the policy group members at the end of the meeting. Estimate about 1 hour for the interview.

For grantees with delegate agencies: Observe the grantee's Policy Council and Policy Committee meetings of each of the delegates selected for review.

Schedule the Governing Body Interview(s)

- Arrange with the director to speak with as many members of the governing body as seems feasible, either as a group or individually (in person or by phone). Work with the grantee director to schedule a group interview or to identify times convenient for reviewers to call governing body members. Estimate about 1 hour for the interview(s).

For grantees with delegate agencies: Speak with the grantee's governing body and the governing body of each delegate selected for review.

Schedule the Child Care Partners Interview(s)

- Work with the director to make arrangements for interviewing child care partner staff. These interviews may be conducted as individual or small group interviews, and may take place either at the child care partner's site or at the Head Start site. If desired, these partners may join other community partners in their respective interviews. Estimate about 30 minutes to 1 hour for the interview(s).

Schedule the Community Partners Interview(s)

- Work with the director to identify and speak with individuals from key community partner agencies, including a representative of the Local Education Agency (LEA), or Part C¹ agency. Communicate to the grantee director that he or she should send the Community Partnerships Information Form (see Appendix II: Forms) to all participants of this interview, and then send the completed forms to you. If desired, request that the grantee director set up individual meetings or group meetings, or find out what times during the week would be convenient for a call or visit. Estimate about 30 minutes to 1 hour for the interview(s).

¹ Individuals with Disabilities Education Act (IDEA)

Schedule the Shadow Bus Ride (if transportation services are offered to children)

- Work with the director to arrange for a reviewer to accompany children on a bus ride. Record on the **Team Assignment Worksheet** the identity of the assigned reviewer and details regarding bus ride arrangements.

Discuss Grantee Briefings

- During initial discussions with the grantee, convey to the grantee director the importance of ongoing communication and discuss your expectations regarding probable frequency, timing, and circumstances of briefings during the on-site phase of the review.

PRISM RECORDS REQUEST

Review team members need to have access to the following materials during the monitoring review. Some of these items can be sent in advance while others should be made available to reviewers during the On-Site Activities phase of the review. Please complete this request prior to the On-Site Activities phase. Specify those documents you wish the grantee to provide in advance and those documents to be made available for review during the On-Site Activities phase. For those documents to be reviewed by the team while on-site, have the grantee specify on this form the location of the files and grantee staff responsible for providing access to the information.

RECORD	LOCATION <i>(if not in central location)</i>	STAFF RESPONSIBLE
RECOMMENDED FOR ADVANCE REVIEW (GRANTEE RECORDS)		
ADVANCE REVIEW - FISCAL REVIEWERS		
Funding/Budget and Fiscal Documentation <ul style="list-style-type: none"> The grantee's external audit reports and accompanying management letters for the past three years If conducted, internal audit reports for the past three years The grantee's current and prior year Financial Assistance Awards (FAAs), including all construction and renovation awards Most recent financial reports as delivered to the governing bodies Organizational chart, list of staff and function of each staff person, including any vacancies The grantee's Policies and Procedures manual(s) covering fiscal operations, including accounting and procurement policies and procedures 	To be delivered to the review team's hotel no later than the Saturday afternoon before the start of the On-Site Activities phase of the review	Grantee Director

RECORD	LOCATION <i>(if not in central location)</i>	STAFF RESPONSIBLE
<ul style="list-style-type: none"> • The grantee's current indirect cost agreement and cost allocation plan • All lease agreements • The grantee's most recent final SF-269 (Financial Status Report) and PMS-272 (Federal Cash Transaction Report) with supporting documentation • Current insurance policies • Grantee's most recent IRS 990, if applicable • All current contracts or other agreements with consultants • Current administrative costs documentation 		
RECOMMENDED FOR ON-SITE REVIEW- ALL REVIEWERS		
Program History <ul style="list-style-type: none"> • Head Start and/or Early Head Start grant applications from the past 2 years • Notice of grant award 		
Program Plans <ul style="list-style-type: none"> • Community Assessment • Long-range program goals and short-term program and financial objectives • Written plan(s) for program services • Child Outcomes plan • Grantee Profile² 		
Program Administration <ul style="list-style-type: none"> • Health Services Advisory Committee minutes • Grievance procedure for parent or community complaints 		

² The Grantee Profile is available on the team leader Web site at www.headstartreviews.com

RECORD	LOCATION <i>(if not in central location)</i>	STAFF RESPONSIBLE
<ul style="list-style-type: none"> • Most recent self-assessment (including description of procedures, results, and actions in response to results) • Ongoing monitoring instrument(s), reports and corrective action documents for the last 12 months. • Recruitment/enrollment information (including policies/procedures, attendance records, and enrollment/waiting list information) • Grantee/delegate contracts, if applicable • Interagency and child care partnership agreements 		
Policy Council Information <ul style="list-style-type: none"> • Bylaws • Membership list • Minutes for the last 12 months • Impasse procedure 		
Governing Body Information <ul style="list-style-type: none"> • Bylaws • Membership list (including roles and responsibilities of members) • Minutes for the last 12 months • Information on policies/procedures related to governance not included elsewhere 		
Personnel-Related Documents <ul style="list-style-type: none"> • Organizational chart or list of staff and function of each staff person, including any vacancies • Job descriptions 		
Training-Related Documents <ul style="list-style-type: none"> • Staff development and training approach • Training and technical assistance (T/TA) plan • Records of all training provided 		

RECORD	LOCATION <i>(if not in central location)</i>	STAFF RESPONSIBLE
General Program Activity Information <ul style="list-style-type: none"> • Menus • Daily classroom schedule • Class rosters • General information supplied to parents • Information on use of volunteers • Schedules of parent meetings and topics 		
Child Records <ul style="list-style-type: none"> • Ongoing assessment of progress • Screening and health care records • Emergency contact information • Individualized Education Plan (IEP) and/or Individualized Family Service Plan (IFSP), if applicable • Food and/or health allergies 		
Family Records <ul style="list-style-type: none"> • Conversation or anecdotal notes • Description of family goals and progress • Documentation of home visits and parent/teacher conferences • Documentation of parent involvement • Enrollment/income eligibility forms 		
Personnel-Related Documents <ul style="list-style-type: none"> • Personnel policies (including policies and procedures pertaining to confidentiality) • Salary schedule • Staff personnel files including staff health records • Staff performance evaluations 		

RECORD	LOCATION <i>(if not in central location)</i>	STAFF RESPONSIBLE
Health- and Safety-Related Policies and Procedures <ul style="list-style-type: none"> • Medication administration • Short-term exclusion • Emergency procedures • Child abuse/neglect reporting procedures • Equipment maintenance logs • Results from environmental tests and/or safety inspections • Hazardous material (e.g., blood, human waste) disposal policies 		
Licenses <ul style="list-style-type: none"> • Child care • Sanitation • Fire/safety • Food handlers • Other (as required under applicable State or local regulations) 		
Fiscal Records <ul style="list-style-type: none"> • Detailed general ledger or accounts payable (AP) disbursements journal • Monthly trial balances • Bank reconciliation • Administrative costs documentation • Written accounting procedures • Program budget planning documents (e.g., forms, memorandums, work papers) • Chart of accounts • Property inventory and files for recent major purchases • Procurement policies • Payroll journal • Insurance policies (e.g., liability, vehicles, child accident) • Non-Federal share documentation 		

RECORD	LOCATION (if not in central location)	STAFF RESPONSIBLE
<ul style="list-style-type: none">• Department of Agriculture (USDA) accounting records and source documents (e.g., meal counts, etc.)• Vendor contracts• Grantee charter document		
Transportation Records <ul style="list-style-type: none">• Bus routes• Bus logs• Driver licenses• Accident records• Maintenance logs		
Other <ul style="list-style-type: none">• Maintenance logs for facility (if owned by grantee)		

COMMUNITY PARTNERSHIPS INFORMATION FORM

Name: _____ Date: _____

Title: _____ Time: _____

Agency: _____

*Please describe your agency's role in the community. What is your role in the agency?**Do you have an interagency agreement with the HS/EHS program? (circle one) Yes No**Tell us about the partnership you have with this Head Start/Early Head Start program.**How do you communicate and what type of information do you share?**What are the strengths of your partnership?**What do you see as the greatest challenges?*



TEAM ASSIGNMENT WORKSHEET

Grantee: _____ Dates of Review: _____

Team Leader: _____

<i>Activity</i>	<i>Who Leads</i>	<i>Who is Also Responsible</i>
Core Questions		
1. Program Governance		
2. Planning		
3. Communication		
4. Record-Keeping and Reporting		
5. Ongoing Monitoring		
6. Self-Assessment		
7. Human Resources		
8. Fiscal Management		
9. Prevention and Early Intervention		
10. Individualization		
11. Mental Health		
12. Disabilities Services		
13. Curriculum and Assessment		
14. Family Partnership Building		
15. Parent Involvement		
16. Community Partnerships		
17. ERSEA		
18. Facilities, Materials, Equipment, and Transportation		

<i>Activity</i>	<i>Who</i>	<i>When</i>	<i>Where</i>
Review Team Planning Meeting			
Entrance Meeting			

TEAM ASSIGNMENT WORKSHEET (CONTINUED)

<i>Activity</i>	<i>Who</i>	<i>When</i>	<i>Where</i>
Health Services Protocol			
Nurtition Services Protocol			
Disabilities Services Protocol			
Mental Health Services Protocol			
Early Childhood Development Protocol			
Family Group Interview Facilitator: Notetaker:			
Government Body Interview(s)			
Policy Group Meeting			
Community Partnership Contacts			
Child Care Partnership Contacts			

TEAM ASSIGNMENT WORKSHEET (CONTINUED)

<i>Activity</i>	<i>Who</i>	<i>When</i>	<i>Where</i>
Health and Safety Checklist Setting #1 #2 #3 #4 #5 #6 #7 #8 #9 #10 #11 #12			
Transportation Services Checklist			
Income Eligibility Data Collection Form			
Grantee Briefings			
Team Meetings			
Other			

Grantee							Review Team		
Child's Name	Age	Program Option	Disability	Language	Parent Name	Parent Attending Focus Group	Siblings Enrolled in HS/EHS	Reviewer	Estimated Time of Observation
Center & Classroom:									
Center & Classroom:									

Grantee								Review Team	
Child's Name	Age	Program Option	Disability	Language	Parent Name	Parent Attending Focus Group	Siblings Enrolled in HS/EHS	Reviewer	Estimated Time of Observation
Center & Classroom: Oak Ridge, Classroom A									
Joe Smith	4	AM only	No	Spanish	George Smith	Yes, Oak Ridge 3/22 at 10AM	Mary Smith, 2, home-based EHS	Jane Doe	Wed. 9 AM
Lisa Name	3	AM only	Yes, Hearing Impaired	English	Mike Name	No	No	John Doe	Tues. 10 AM
Center & Classroom: Wonder St Center, Classroom 201									
One Child	2	Full Day	No	English	Jen Child	No, working but can be reached by phone.	Older Child, 4, Classroom 204	Jeff Doe	Tues. 3 PM

THE SELECTION PROCESS

In the sections that follow, instructions are given for selection at three different levels: (1) centers or geographic areas; (2) classrooms, family child care homes, and home visitors; and (3) focus children and their families. Note that the first level, "centers or geographic areas," is meant to characterize locations of center-based classrooms, groupings of home-based services, or groupings of family child care homes. These three levels of selection will not be needed when reviewing all grantees. If all centers or geographic areas will be visited, skip Step 1.

The discussion provides a step-by-step methodology to use in preparing for a review, using the Selection Tree form immediately following the selection process description.

Step 1: Select Centers or Geographic Areas to Visit

(Skip this step if all centers and geographic areas will be visited.)

The goal of this step is to choose the centers, family child care homes, and home-based areas that one or more members of the review team will visit. If there are too many centers to visit (or if they are too far apart), the team leader needs to collect information on certain characteristics of each center and select those that will be visited. Because of their effects on the quality of services, the following characteristics of centers should be considered in the selection:

- The center is relatively new to Head Start and has not yet been reviewed;
- The center is part of a child care partnership; and
- The grantee's Head Start director wants to showcase the center's excellence or has expressed concern about its performance.

A premise of the PRISM review is that reviewers will be thorough in investigating the experience of at least one child and his/her family in every center, family child care option, or home-based option in the group selected. So the number of centers (or areas) selected must be limited enough to allow for reviewer thoroughness, yet expansive enough to cover the range of services offered by the grantee. (If the number of centers that are automatically included exceeds the number that can be visited, the team leader may randomly select from new centers and those that are part of the child care partnerships.)

Taking into account the size of the team and the distances between centers, the team leader needs to decide how many additional centers can be selected. These additional centers should represent the variety of center-based services (e.g., part-day and full-day). If the grantee has delegate agencies, the selected centers must include at least one that is operated by each delegate agency. In a morning (or an afternoon or evening), each reviewer can be assigned about three classrooms in a single center, one classroom in each of two different centers, or two different family child care homes (if these centers or homes are fairly close to each other). Each reviewer can accompany a home visitor on one home visit in a morning or an afternoon.

Home-based services and family child care homes are generally clustered in geographic areas. If it will not be possible to visit all family child care homes or accompany all home visitors, the team leader should select certain geographic areas for visits. For example, if the grantee's operations cover a five-county area and cluster home visitors by county, the team leader should choose the counties that will be visited. Selection can be random, taking into account the director's knowledge of services in the various counties. If services are very different (e.g., two counties provide home-based services to children with significant disabilities), the selection should reflect the differences.

Using the Selection Tree can be helpful in choosing the centers and geographic areas. To begin, record the names of all centers and areas that may potentially be visited. (The only ones initially excluded will be those operated by delegate agencies that will not be visited.) If the grantee has delegate agencies, be sure to list each center name under the correct delegate agency name. Also, list each geographic area in which the grantee manages family child care homes or home-based options. If the grantee has no delegates, list the centers and areas from left to right, beginning with (1). Then note any special features of each center or area next to its name (e.g., write "EHS" to show the centers operating Early Head Start, "FCC" for a geographic area that operates family child care homes, "CC" for a child care partnership, or "PROB" to indicate the director's concern).

When an initial decision has been made about the selection of centers, the team leader should circle all of these centers on the Selection Tree. It is then advisable to check that the selected group:

- Contains as many new centers as possible;
- Includes child care partnerships, if they exist;
- Represents all program options; and
- Contains at least one center operated by each delegate agency (if applicable).

Step 2: Select Classrooms, Family Child Care Homes, and Home Visitors

The next task is to identify the specific staff whose classes or family child care homes will be observed, or who will be accompanied on a home visit. In general, the team leader can randomly choose classes within selected centers or family child care homes in the geographic area selected for visits. For the home-based option, the team leader can randomly select home visitors. However, the team leader does need to keep in mind geographic constraints. A reviewer may be able to see multiple classrooms or homes in a day, but distances between locations should be taken into account when deciding just how many are reasonable.

Begin this step by recording the names of each lead teacher in a center and each family child care provider or home visitor in a geographic area on the Selection Tree. For example, check the name of the center numbered (1) in Step 1. Under number (1) in Step 2 are spaces for five names. Write the name of each relevant staff member, one per line, to indicate the groupings of children in the center's program. Following each name, note whether the person is a lead teacher (LT), a family child care provider (FCC), or a home visitor (HV). Then complete the

list for all other centers and geographic areas to be visited.

Step 3: Select Focus Children and Their Families

The final step in the selection process is to choose the children and their families that will be the focus of the data-gathering efforts during the review. Generally, no more than one child per class, family child care home, or home visitor case load is included. It is important to select focus children and their families prior to the review so that grantee staff can schedule the Family Group Interview at times convenient for the adults in focus families. Choosing families in advance also allows the grantee to secure home-based families' permission to invite a reviewer into their home. Team leaders may select "alternates" in case a focus child has moved between the time of selection and the review, a family does not feel comfortable opening their home, or reviewers find concerns and wish to check on additional families. Team leaders need to have contingency plans in case of absent children and help reviewers think of alternate ways to contact parents who are not able to attend the Family Group Interview.

Prior to selection, it is suggested that the team leader obtain rosters, indicating each child's age and noting children with disabilities. Some team leaders may ask for a choice of more than one child per class or home visitor, and then make the final selection. In general, the selection of children is random. However, the team leader may first want to choose children with disabilities from some of the classes or geographic areas, one per class. Inclusion of at least one child with more significant disabilities is recommended. Child care partnerships should also be included when selecting focus children. For the remaining groups, random selection can proceed.

The actual number of families may vary due to the distance between sites included in the review and the grantee's program options. For example, if the grantee operates either a home-based or family child care option, a reviewer needs to be assigned families experiencing those options.

Focus children and families are key to data gathering for all Service Reviewers. Data from focus children and families also help systems reviewers understand how well systems support partnership building and delivery of services to children and families. Data gathering on focus children and families may be sufficient to allow reviewers to fully describe grantee services. If reviewers are satisfied that they have a good understanding of the program through the use of this group, they may end their work. However, if the focus children and families raise questions that can be answered only by reviewing additional files, talking with additional staff, or observing in other classes, reviewers should take these extra steps as well.

Note: When the Selection Tree is complete, the team leader records the classroom, home visit, and focus children assignments on the Team Assignment Worksheet. The grantee may need to fill out additional information in the focus children portion of the Team Assignment Worksheet and then submit it to the team leader.

Grantee Name	<div></div>																			
Delegate Names (All delegates will be reviewed concurrently with the grantee review)	<div></div>																			
Step 1: Center names or Geographic Areas	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
Step 2: Lead Teacher/ Home Visitor/ Family Child Care Provider Names																				
Step 3: Child Names																				

Go to class lists for selection of one focus child per class or group. Make sure a sample of children with disabilities is chosen, that child care partnerships and all options are represented, and that all age groups are included.

SUMMARY OF REVIEW DECISIONS INSTRUCTIONS

The Summary of Review Decisions Worksheet is a tool to help team leaders and other review team members, identify, organize, and track the progression of the following components related to individual Core Questions during team meetings throughout the week: Issues Raised by Team Members, Follow-up Items for Tomorrow, Possible Citations, and Related Citations and Core Questions. Notes can be entered for each category on a daily basis (Monday to Thursday, which, on a typical review, are the days when most of the team meetings and review decision collaboration processes occur). The following is a more detailed description for each category listed in the first column of the form:

- **Issues Raised by Team Members:** This space is for any issues or concerns that team members have identified and raised during daily team meetings or throughout the review week. Most of these issues will need some type of follow-up action (e.g., verification through records, interviewing a grantee staff member), which is the next element of the form.
- **Follow-Up Items for Tomorrow:** This area should be used to identify any follow-up action necessary to resolve the issues raised by team members in the first box.
- **Possible Citations:** To make the report writing process easier and faster, it is a good idea to have possible citations for concerns written out during the week, so that by Thursday, review team members already have a good idea of which citations may be cited in the draft Head Start Review Report. Additionally, by checking the citations before Thursday, review team members can determine at an earlier point in the week how a particular concern matches up with the program requirements.
- **Related Citations & Core Questions:** The FY 2006 version of PRISM places an even stronger emphasis on the interrelationships between systems, services, and partnerships. Therefore, review team members should be communicating with one another to determine if a system or service concern is pervasive. This category aims to help guide reviewers in their effort to determine the pervasiveness of a potential area of noncompliance.

Located directly under each Core Question heading is a space for the team leader to circle the appropriate preliminary review decision based on the review team's activities throughout the week.

EARLY CHILDHOOD DEVELOPMENT AND HEALTH (ECDH)

Core Question 9a:

Prevention and Early Intervention for Health and Nutrition

Review Decision in Draft Head Start Review Report (circle one):

Preliminary Areas of Noncompliance	OR	No Preliminary Areas of Noncompliance
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Monday

Tuesday

Wednesday

Thursday

Issues Raised by Team Members

Follow-Up Items for Tomorrow

Possible Citations

Related
Citations & Core
Questions

<div>Core Question 9b:</div> <div>Managing Health and Nutrition Services</div> <div>Review Decision in Draft Head Start Review Report (circle one):</div> <div>Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance</div>	Monday				Tuesday				Wednesday				Thursday			
	Issues Raised by Team Members															
	Follow-Up Items for Tomorrow															
	Possible Citations															
	Related Citations & Core Questions															

Core Question 10: Individualization Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance					
	Monday	Tuesday	Wednesday	Thursday	
	Issues Raised by Team Members				
	Follow-Up Items for Tomorrow				
	Possible Citations				
Related Citations & Core Questions					

Core Question 11: Mental Health Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance				
	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				

Core Question 12: Disabilities Services Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance				
	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				

<div>Core Question 13:</div> <div>Curriculum and Assessment</div> <div>Review Decision in Draft Head Start Review Report (circle one):</div> <div>Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance</div>	Monday				Tuesday				Wednesday				Thursday			
	Issues Raised by Team Members															
	Follow-Up Items for Tomorrow															
	Possible Citations															
	Related Citations & Core Questions															

FAMILY AND COMMUNITY PARTNERSHIPS (FCP)					
Core Question 14: Family Partnership Building Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance					
	Monday	Tuesday	Wednesday	Thursday	
	Issues Raised by Team Members				
	Follow-Up Items for Tomorrow				
Possible Citations					
Related Citations & Core Questions					

<div>Core Question 15:</div> <div>Parent Involvement</div> <div>Review Decision in Draft Head Start Review Report (circle one):</div> <div>Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance</div>	Monday				Tuesday				Wednesday				Thursday			
	Issues Raised by Team Members															
	Follow-Up Items for Tomorrow															
	Possible Citations															
	Related Citations & Core Questions															

Core Question 16: Community Partnerships Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance				
	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				

PROGRAM DESIGN AND MANAGEMENT (PDM)					
Core Question 1:	Program Governance				
	Review Decision in Draft Head Start Review Report (circle one):				
	Preliminary Areas of Noncompliance	OR	No Preliminary Areas of Noncompliance		
	Monday	Tuesday	Wednesday	Thursday	
Issues Raised by Team Members					
Follow-Up Items for Tomorrow					
Possible Citations					
Related Citations & Core Questions					

Core Question 2: Planning Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance				
	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				

<div>Core Question 3:</div> <div>Communication</div> <div>Review Decision in Draft Head Start Review Report (circle one):</div> <div>Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance</div>	Monday				Tuesday				Wednesday				Thursday			
	Issues Raised by Team Members															
	Follow-Up Items for Tomorrow															
	Possible Citations															
	Related Citations & Core Questions															

<div>Core Question 4:</div> <div>Record-Keeping and Reporting</div> <div>Review Decision in Draft Head Start Review Report (circle one):</div> <div>Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance</div>				
	Thursday			
	Wednesday			
	Tuesday			
	Monday			
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				

<div>Core Question 5:</div> <div>Ongoing Monitoring</div> <div>Review Decision in Draft Head Start Review Report (circle one):</div> <div>Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance</div>	Monday				Tuesday				Wednesday				Thursday			
	Issues Raised by Team Members															
	Follow-Up Items for Tomorrow															
	Possible Citations															
	Related Citations & Core Questions															

Core Question 6: Self-Assessment Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance					
	Monday	Tuesday	Wednesday	Thursday	
Issues Raised by Team Members					
Follow-Up Items for Tomorrow					
Possible Citations					
Related Citations & Core Questions					

<div>Core Question 7:</div> <div>Human Resources</div> <div>Review Decision in Draft Head Start Review Report (circle one):</div> <div>Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance</div>	Monday				Tuesday				Wednesday				Thursday			
	Issues Raised by Team Members															
	Follow-Up Items for Tomorrow															
	Possible Citations															
	Related Citations & Core Questions															

Core Question 8: Fiscal Management Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance				
	Monday	Tuesday	Wednesday	Thursday
	Issues Raised by Team Members			
	Follow-Up Items for Tomorrow			
	Possible Citations			
Related Citations & Core Questions				

Core Question 17: Eligibility, Recruitment, Selection, Enrollment, and Attendance (ERSEA) Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance	Monday				Tuesday				Wednesday				Thursday			
	Issues Raised by Team Members															
	Follow-Up Items for Tomorrow															
	Possible Citations															
	Related Citations & Core Questions															

Core Question 18: Facilities, Materials, Equipment, and Transportation Review Decision in Draft Head Start Review Report (circle one): Preliminary Areas of Noncompliance OR No Preliminary Areas of Noncompliance				
	Monday	Tuesday	Wednesday	Thursday
Issues Raised by Team Members				
Follow-Up Items for Tomorrow				
Possible Citations				
Related Citations & Core Questions				



Code of Conduct for Head Start Reviewers (Appendix III)

Code of Conduct for Head Start Reviewers

The standards of performance listed below provide standard requirements and expectations for Head Start monitoring reviewers. Each reviewer must sign this document at the beginning of each review season prior to participating in any monitoring reviews. An electronic copy remains on file at Danya International, Inc. (“Danya”); the reviewers shall retain a copy for their records. The standards are divided into the following categories: Preparation, Review Procedures and Guidelines, Conflict of Interest, and General Professional Standards.

Preparation

1. Reviewers must represent their education, experience, and skills accurately, as described in the reviewer profile maintained and updated by Danya for the Head Start Bureau. Reviewers shall accept assignments only in content areas matching their expertise.
2. Reviewers shall remain knowledgeable of Head Start or Early Head Start performance standards and applicable regulations, and they must understand their role as a review team member.
3. Employees working for a Head Start and/or Early Head Start grantee must obtain the required prior approval from the grantee to participate in reviews. A staff member of a deficient grantee and its delegate will not be allowed to participate in reviews until the grantee has been removed from deficiency status. Reviewers must notify the Review Planner (RP) of any change of employment status with the grantee.
4. Reviewers must be prompt in all appointments. If unexpected events delay appearance for an appointment, notify those who are waiting—as well as the team leader—of the change or delay.
5. Reviewers must be prepared to participate in all meetings at the starting time.
6. Reviewers should proactively download the PRISM instrument and latest PRISM software (www.headstartreviews.com).
7. Reviewers must make a proactive effort to remain current on reviewer standards, special announcements, and policy changes by making regular (quarterly) visits to the Monitoring Reviewer Web site.
8. Reviewers are responsible for notifying the RP as soon as possible when travel delays or other emergencies cause a delay or cancellation of the scheduled travel plans.

Review Procedures and Guidelines

9. The team leader is the primary responsible agent for the conduct of each review, throughout the review process, and in all interactions with the grantee. Reviewers should:
 - a. Follow the schedules and procedures as outlined by the team leader using the current Head Start PRISM instrument and requirements to complete the assignments.
 - b. Gather and analyze critical information based solely on the *Head Start Program Performance Standards* and applicable regulations.
 - c. Coordinate with the team leader to request information and documentation only as required by the current PRISM instrument and process. Give ample opportunity for program staff members to provide information or documentation needed for the collection and analysis of data to complete the assignment.
 - d. Follow the grantee's chain of command and procedures for reviewing documentation. Return all program materials to the grantee (or as instructed by the team leader) as soon as possible and no later than the closing meeting with the grantee.
 - e. Prior to the summary meeting, prepare and submit to the team leader a written summary and a report of findings as assigned, in accordance with the current PRISM format. Note that responses and notes regarding the Core Questions and/or Protocols should be provided in the corresponding sections for that question.
 - f. Confer with the team leader regarding interpretation of the Federal regulations.
 - g. Refer unusual questions (those that fall outside their area of expertise or outside of responsibilities as a review team member), sensitive issues, and program and community complaints to the team leader for response.
 - h. At the end of the review, all information is considered property of the Federal Government and will be submitted to the team leader. All electronic files are to be deleted from reviewer laptop computers before the summary meeting.
 - i. Protect the confidentiality of all child, family, and staff files by securing and returning them to proper custody.
 - j. Reviewers must initial and date all pages of documentation, such as notes, Core Questions, and other completed tools.

Conflict of Interest

10. Any potential conflict of interest or appearance of a conflict of interest must be disclosed at the time of request to serve as a team member on a review. This includes disclosing work as a previous reviewer, consultant, or potential consultant for the grantee being reviewed.

11. Reviewers must remove themselves from participation or discussion at any point that a perceived conflict of interest may arise, or if any other reason exists whereby objectivity or the review itself could be compromised.
12. Reviewers should have no contact with a grantee for a period of 12 months before and after the review occurs.

General Professional Standards

13. Complete and strict confidentiality is required on all matters and information associated with the grantee being reviewed, including all files (individual, child, family, and staff) and documents reviewed. All discussions and findings pertaining to the grantee and review findings shall not be discussed in public places during the onsite visit. Do not discuss information about the substance and findings of the review with anyone except the team leader, team members, and persons expressly designated by the team leader.
14. Reviewers must adhere to Federal guidelines concerning acceptance and giving of gifts.
15. Reviewers must refrain from alcohol consumption during business hours, including evening meetings associated with the onsite review. Abuse of alcohol or any other drug, legal or illegal, will result in immediate dismissal from the current review by the team leader and permanent removal from the pool of eligible reviewers.
16. Sexual harassment (slurs, jokes, epithets, touching, impeding, body blocking, leering, suggestive gestures, or any other unsolicited, written, verbal, physical, or visual contact with sexual overtures) will result in immediate dismissal from the current review by the team leader and permanent removal from the pool of eligible reviewers.
17. Promotion of services (personal, other firms, or colleagues) in any way or provision of technical assistance to the grantee or any staff members, constituents, or parents during the review is strictly prohibited. Generally, reviewers and any entities associated with the reviewer, should refrain from entering into any work assignments, paid or otherwise, pertaining to a grantee being reviewed for at least 12 months prior to or following completion of the review.
18. Reviewers must behave in a professional manner during the review. Always be courteous, pleasant, and respectful in asking questions, taking part in discussions, or other interactions with the grantee. Respect the knowledge and experience of the grantee staff members, parents, contract staff members, and community partners. Do not engage in gossip or office politics during interactions with program staff members, parents, contract staff members, and community partners. Unprofessional conduct may result in immediate dismissal from a review by the team leader.
19. Reviewers must dress appropriately for work in the grantee's environment. Reviewers should follow local agency work rules regarding smoking, safety, security, food on

the premises, working hours, and other local requirements. Reviewers should request permission before using the grantee's telephone or other equipment for any purpose.

20. Do not offer advice or recommendations to any individual about the quality or operation of the program. Recognize the responsibility of the grantee managers and others to supervise their staff.
21. Always respect the language, culture, and ethnic identity of grantee staff members, parents, contract staff members, and community partners.
22. Reviewers should work collaboratively and cooperatively with other team members. This includes:
 - a. Respecting the skills, experiences, and knowledge of fellow team members;
 - b. Contributing information and analysis of assignments at each team meeting in a concise and orderly manner to facilitate efficient use of the meeting time; and
 - c. Sharing information, actively seeking informed agreement among team members, and fully supporting the final decisions of the team leader.
23. Reviewers must commit to performing and completing PRISM-related tasks ONLY while on assignment. Other distractions should be eliminated (for example, cell phones should be turned off during interviews, data collection, and team meetings).
24. These standards may be updated, modified, or otherwise revised from time to time by Danya and/or the Head Start Bureau. Any such revision will be in writing and provided to reviewers by posting to a Head Start Reviewer-focused Web site prior to its effective date.

Acknowledgement and Acceptance

I have read, understand, and agree to the standards of performance for Head Start monitoring reviewers (September 2004, Version 1), as set forth above. I understand that failure to comply with these standards may result in a decision for dismissal from the review, and the Head Start Regional Office may recommend to Danya that my name be removed from the pool of potential reviewers.

Reviewer's Signature and Date

Printed Name



Resources List

(Appendix IV)

STANDARDS AND REGULATIONS

Americans with Disabilities Act and Child Care

<http://www.usdoj.gov/crt/ada/childq%26a.htm>

This site provides a list of frequently asked questions with regard to the application of the ADA to child care centers. The list was compiled by the Department of Justice.

Section 504 of the Rehabilitation Act

<http://www.hhs.gov/ocr/504.html>

This fact sheet is from the website of the U.S. Department of Health and Human Services' Office of Civil Rights. It describes the role of Section 504 of the Rehabilitation Act of 1973 in protecting qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations (including Head Start grantees) that receive financial assistance from the U.S. Department of Health and Human Services (DHHS).

Head Start Program Performance Standards

<http://www.acf.hhs.gov/programs/hsb/performance/index.htm>

The Head Start Regulations, Title 45 of the Code of Federal Regulations, Parts 1301 through 1311, state the required operating procedures and services that Head Start programs are to provide to the children and families they serve. Program Guidance for Parts 1304 and 1308 is included.

Information Memoranda (IMs) and Program Instructions (PIs)

http://www.headstartinfo.org/publications/im_cont.htm

These documents are provided by year of issue on the Head Start Information and Publication Center Web site. Some IMs and PIs that might be helpful during reviews include the following (see Web site for complete listing):

Services to Pregnant Women Participating in Early Head Start

http://www.headstartinfo.org/publications/im02/im02_04.htm

Final Rule on Head Start Transportation

http://www.headstartinfo.org/publications/im01/im01_01.htm

Services to Families with Limited English Proficiency

http://www.headstartinfo.org/publications/im01/im01_02.htm

Financial Management Issues in Head Start Programs Utilizing Other Sources of Funding

http://www.headstartinfo.org/publications/im01/im01_06.htm

Head Start Family Worker Training and Credentialing

http://www.headstartinfo.org/publications/im01/im01_08.htm

Applicability of the Fair Labor Standards Act to Head Start and EHS Grantees

http://www.headstartinfo.org/publications/im01/pi01_01.htm

Child Development Services During Home Visits and Socializations in the Early Head Start Home-Based Program Option

http://www.headstartinfo.org/publications/im00/im00_22.htm

Final Rule on Purchase of Head Start Facilities and Proposed Rule for Construction and Renovation of Head Start Facilities

http://www.headstartinfo.org/publications/im99/im99_01.htm

Guidance on the Interpretation of Federal Public Benefit

http://www.headstartinfo.org/publications/im98/im98_12.htm

National Highway Safety Traffic Administration (NHSTA) Bus Safety

<http://www.nhtsa.dot.gov/portal/site/nhtsa/menuitem.e712547f8daccabbbf30811060008a0c/>

This site provides updates from the NHSTA on regulations regarding drivers, vehicle operation, and occupant safety for buses.

State Child Care Profiles and Licensing Regulations

<http://www.nccic.org/statedata/statepro/index.html>

The U.S. map at this site provides links to profiles for each state. Each state profile includes demographic information about child care, as well as contact information for different state agencies, including licensing and regulatory agencies, involved in child care.

45 CFR 74 - Uniform Grants Administration Regulations

http://www.access.gpo.gov/nara/cfr/waisidx_99/45cfr74_99.html

This site provides uniform administrative requirements for awards and subawards to institutions of higher education, hospitals, other nonprofit organizations, and commercial organizations; and certain grants and agreements with States, local governments, and Indian tribal governments.

45 CFR 92 - Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments
http://www.access.gpo.gov/nara/cfr/waisidx_99/45cfr92_99.html

REVIEW-RELATED FORMS AND INFORMATION

Head Start Reviews Website

<http://www.headstartreviews.com/>

From this page, team leaders and reviewers have access to the following forms, documents, and links, via Danya International Inc., the monitoring support contractor:

Reviewer Code of Conduct

http://www.headstartreviews.com/docs/CodeofConduct_Nov2002r3.pdf

Travel Expense Form

<http://www.headstartreviews.com/docs/TER.pdf>

Certificate of Performance

<http://www.headstartreviews.com/docs/cop.pdf>

Mileage Log

<http://www.headstartreviews.com/docs/MileageLog.pdf>

Policy Updates Affecting Head Start Reviewers

<http://www.headstartreviews.com/policies.asp>

Frequently Asked Questions about Head Start Reviews

<http://www.headstartreviews.com/faqs.asp>

Monitoring Toolkit

<http://www.headstartreviews.com/mt.asp>

Disabilities Toolkit

<http://www.headstartreviews.com/dt.asp>

Early Head Start Toolkit

<http://www.headstartreviews.com/et.asp>

Team Leader Web site

<http://www.headstartreviews.com/>

This URL also provides access to the password-protected Team Leader Web site. Click on FTL home and enter your ID and Password. Then, click on the PRISM Training and Support Contract to enter the PRISM Home Page. From the PRISM Home Page, you have access to PRISM training materials, manuals, minutes from National Monitoring Workgroup conference calls, and Head Start Monitoring reports.

Also, from the password-secure portion of the Team Leader Web site (<http://www.headstartreviews.com>, you can click on the Monitoring Support Contract link to access the Regional Office/FTL Main Page provided by Danya, Inc., (also, see above at Head Start Reviews). This page provides links to Head Start Review Tracking System data, the Grantee Profile, the Review Team Request Form, Incident Report Form, and other reports, forms, and instructions.

Fiscal Assistant

<http://www.acf.hhs.gov/programs/hsb/hsfa/>

The Fiscal Assistant Web site provides authoritative information for Head Start managers and fiscal staff. Browse the site by fiscal topic. The site includes plain-language narratives that explain Head Start fiscal requirements, audit considerations, and related information, as well as answers to Frequently Asked Questions (FAQs).

The site also features a Fiscal Assistant Library. Items in the Library include the Head Start Act, Office of Management and Budget circulars, Department of Health and Human Services regulations, Information Memoranda, Program Instructions, Departmental Appeals Board Decisions and more. The Fiscal Assistant Search Engine allows users to locate Library documents containing specific words, phrases, and regulation citations.

The Head Start Information and Publication Center

<http://www.headstartinfo.org/infocenter/infocenter.htm>

In addition to IMs and PIs, this Web site provides links to other useful documents, including program toolkits, a Federal Register Alert Archive, and an online request form to query their Information Services team. For instance, Early Head Start tipsheets can be found at http://www.headstartinfo.org/infocenter/ehs_tipsheet/

Early Head Start National Resource Center Information Resources

<http://www.ehsnrc.org/InformationResources/Index.htm>

The information at this site includes print and video materials, research abstracts, and links to related Early Head Start World Wide Web resources. The material is organized according to the framework of the Head Start Program Performance Standards.

SOFTWARE**PRISM Head Start Monitoring Tracking System**

<http://www.headstartreviews.com>

This site provides access to the PRISM Software that assists team leaders and Head Start reviewers in organizing and recording their findings during reviews. Reviewers use PRISM to generate reports that summarize findings. PRISM Software includes the text of the Performance Standards and allows users to search the standards by keyword. The Lewin Group provides technical support for reviewers and can be reached through their technical support hotline at 1-800-518-1932 or via e-mail at PRISMhelpdesk@lewin.com.

Grant Application Budget Instrument

<http://www.acfgabi.com>

The Grant Application Budget Instrument (GABI) is a software application designed to simplify and expedite the grant application process.

OTHER USEFUL INFORMATION

General Accounting Office, **Head Start: Comprehensive Approach to Identifying and Addressing Risks Could Help Prevent Grantee Financial Management Weaknesses**, April 2005 (GAO-05-473T).

<http://www.gao.gov/new.items/d05473t.pdf>

General Accounting Office, **Standards for Internal Control in the Federal Government**, November 1999 (GAO/AIMD-00-21.3.1)

<http://www.gao.gov/special.pubs/ai00021p.pdf>

Committee of Sponsoring Organizations of the Treadway Commission, **Internal Control -- Integrated Framework** (July 1994).

Committee of Sponsoring Organizations of the Treadway Commission “**Enterprise Risk Management - Integrated Framework**”(September 2004).